

# FEDERAL OPERATING PERMIT

A FEDERAL OPERATING PERMIT IS HEREBY ISSUED TO

Structural Metals, Inc.

AUTHORIZING THE OPERATION OF

SMI-Texas  
Steel Works

LOCATED AT

Guadalupe County, Texas

Latitude 29° 34' 32" Longitude 98° 1' 57"

Regulated Entity Number: RN102413689

This permit is issued in accordance with and subject to the Texas Clean Air Act (TCAA), Chapter 382 of the Texas Health and Safety Code and Title 30 Texas Administrative Code Chapter 122 (30 TAC Chapter 122), Federal Operating Permits. Under 30 TAC Chapter 122, this permit constitutes the permit holder's authority to operate the site and emission units listed in this permit. Operations of the site and emission units listed in this permit are subject to all additional rules or amended rules and orders of the Commission pursuant to the TCAA.

This permit does not relieve the permit holder from the responsibility of obtaining New Source Review authorization for new, modified, or existing facilities in accordance with 30 TAC Chapter 116, Control of Air Pollution by Permits for New Construction or Modification.

The site and emission units authorized by this permit shall be operated in accordance with 30 TAC Chapter 122, the general terms and conditions, special terms and conditions, and attachments contained herein.

This permit shall expire five years from the date of issuance. The renewal requirements specified in 30 TAC § 122.241 must be satisfied in order to renew the authorization to operate the site and emission units.

Permit No: O1316 Issuance Date: May 24, 2011

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For the Commission

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## **General Terms and Conditions**

The permit holder shall comply with all terms and conditions contained in 30 TAC § 122.143 (General Terms and Conditions), 30 TAC § 122.144 (Recordkeeping Terms and Conditions), 30 TAC § 122.145 (Reporting Terms and Conditions), and 30 TAC § 122.146 (Compliance Certification Terms and Conditions).

In accordance with 30 TAC § 122.144(1), records of required monitoring data and support information required by this permit, or any applicable requirement codified in this permit, are required to be maintained for a period of five years from the date of the monitoring report, sample, or application unless a longer data retention period is specified in an applicable requirement. The five year record retention period supersedes any less stringent retention requirement that may be specified in a condition of a permit identified in the New Source Review Authorization attachment.

If the permit holder chooses to demonstrate that this permit is no longer required, a written request to void this permit shall be submitted to the Texas Commission on Environmental Quality (TCEQ) by the Responsible Official in accordance with 30 TAC § 122.161(e). The permit holder shall comply with the permit's requirements, including compliance certification and deviation reporting, until notified by the TCEQ that this permit is voided.

The permit holder shall comply with 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit.

All reports required by this permit must include in the submittal a cover letter which identifies the following information: company name, TCEQ regulated entity number, air account number (if assigned), site name, area name (if applicable), and Air Permits Division permit number(s).

## **Special Terms and Conditions: Emission Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting**

1. Permit holder shall comply with the following requirements:
  - A. Emission units (including groups and processes) in the Applicable Requirements Summary attachment shall meet the limitations, standards, equipment specifications, monitoring, recordkeeping, reporting, testing, and other requirements listed in the Applicable Requirements Summary attachment to assure compliance with the permit.
  - B. The textual description in the column titled "Textual Description" in the Applicable Requirements Summary attachment is not enforceable and is not deemed as a substitute for the actual regulatory language. The Textual Description is provided for information purposes only.

- C. A citation listed on the Applicable Requirements Summary attachment, which has a notation [G] listed before it, shall include the referenced section and subsection for all commission rules, or paragraphs for all federal and state regulations and all subordinate paragraphs, subparagraphs and clauses, subclauses, and items contained within the referenced citation as applicable requirements.
  - D. When a grouped citation, notated with a [G] in the Applicable Requirements Summary, contains multiple compliance options, the permit holder must keep records of when each compliance option was used.
  - E. Emission units subject to 40 CFR Part 63, Subparts ZZZZ and YYYYY as identified in the attached Applicable Requirements Summary table are subject to 30 TAC Chapter 113, Subchapter C, § 113.1090 and § 113.1340 which incorporate the 40 CFR Part 63 Subparts by reference.
2. The permit holder shall comply with the following sections of 30 TAC Chapter 101 (General Air Quality Rules):
- A. Title 30 TAC § 101.1 (relating to Definitions), insofar as the terms defined in this section are used to define the terms used in other applicable requirements
  - B. Title 30 TAC § 101.3 (relating to Circumvention)
  - C. Title 30 TAC § 101.8 (relating to Sampling), if such action has been requested by the TCEQ
  - D. Title 30 TAC § 101.9 (relating to Sampling Ports), if such action has been requested by the TCEQ
  - E. Title 30 TAC § 101.10 (relating to Emissions Inventory Requirements)
  - F. Title 30 TAC § 101.201 (relating to Emission Event Reporting and Recordkeeping Requirements)
  - G. Title 30 TAC § 101.211 (relating to Scheduled Maintenance, Start-up, and Shutdown Reporting and Recordkeeping Requirements)
  - H. Title 30 TAC § 101.221 (relating to Operational Requirements)
  - I. Title 30 TAC § 101.222 (relating to Demonstrations)
  - J. Title 30 TAC § 101.223 (relating to Actions to Reduce Excessive Emissions)
3. Permit holder shall comply with the following requirements of 30 TAC Chapter 111:

- A. Visible emissions from stationary vents with a flow rate of less than 100,000 actual cubic feet per minute and constructed after January 31, 1972 that are not listed in the Applicable Requirements Summary attachment for 30 TAC Chapter 111, Subchapter A, Division 1 , shall not exceed 20% opacity averaged over a six-minute period. The permit holder shall comply with the following requirements for stationary vents at the site subject to this standard:
- (i) Title 30 TAC § 111.111(a)(1)(B) (relating to Requirements for Specified Sources)
  - (ii) Title 30 TAC § 111.111(a)(1)(E)
  - (iii) Title 30 TAC § 111.111(a)(1)(F)(i), (ii), (iii), or (iv)
  - (iv) For emission units with vent emissions subject to 30 TAC § 111.111(a)(1)(B), complying with 30 TAC § 111.111(a)(1)(F)(ii), (iii), or (iv), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO<sub>x</sub>, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146. These periodic monitoring requirements do not apply to vents that are not capable of producing visible emissions such as vents that emit only colorless VOCs; vents from non-fuming liquids; vents that provide passive ventilation, such as plumbing vents; or vent emissions from any other source that does not obstruct the transmission of light. Vents, as specified in the “Applicable Requirements Summary” attachment, that are subject to the emission limitation of 30 TAC § 111.111(a)(1)(B) are not subject to the following periodic monitoring requirements:
    - (1) An observation of stationary vents from emission units in operation shall be conducted at least once during each calendar quarter unless the emission unit is not operating for the entire quarter.
    - (2) For stationary vents from a combustion source, if an alternative to the normally fired fuel is fired for a period greater than or equal to 24 consecutive hours, the permit holder shall conduct an observation of the stationary vent for each such period to determine if visible emissions are present. If such period is greater than 3 months, observations shall be conducted once during each quarter. Supplementing the normally fired fuel with natural gas or fuel gas to increase the net heating value to the minimum required value does not constitute creation of an alternative fuel.

- (3) Records of all observations shall be maintained.
- (4) Visible emissions observations of emission units operated during daylight hours shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations of emission units operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible emissions observations shall be made during times when the activities described in 30 TAC § 111.111(a)(1)(E) are not taking place. Visible emissions shall be determined with each stationary vent in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from each stationary vent during the observation. For outdoor locations, the observer shall select a position where the sun is not directly in the observer's eyes. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. A certified opacity reader is not required for visible emissions observations.
- (5) Compliance Certification:
  - (a) If visible emissions are not present during the observation, the RO may certify that the source is in compliance with the applicable opacity requirement in 30 TAC § 111.111(a)(1) and (a)(1)(B).
  - (b) However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2) or conduct the appropriate opacity test specified in 30 TAC § 111.111(a)(1)(F) as soon as practicable, but no later than 24 hours after observing visible emissions to determine if the source is in compliance with the opacity requirements. If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation

on the next deviation report as required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader.

- (c) Some vents may be subject to multiple visible emission or monitoring requirements. All credible data must be considered when certifying compliance with this requirement even if the observation or monitoring was performed to demonstrate compliance with a different requirement.

B. For visible emissions from a building, enclosed facility, or other structure; the permit holder shall comply with the following requirements:

- (i) Title 30 TAC § 111.111(a)(7)(A) (relating to Requirements for Specified Sources)
- (ii) Title 30 TAC § 111.111(a)(7)(B)(i) or (ii)
- (iii) For a building containing an air emission source, enclosed facility, or other structure containing or associated with an air emission source subject to 30 TAC § 111.111(a)(7)(A), complying with 30 TAC § 111.111(a)(7)(B)(i) or (ii), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO<sub>x</sub>, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146:
  - (1) An observation of visible emissions from a building containing an air emission source, enclosed facility, or other structure containing or associated with an air emission source which is required to comply with 30 TAC § 111.111(a)(7)(A) shall be conducted at least once during each calendar quarter unless the air emission source or enclosed facility is not operating for the entire quarter.
  - (2) Records of all observations shall be maintained.
  - (3) Visible emissions observations of air emission sources or enclosed facilities operated during daylight hours shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations of air emission sources or enclosed facilities operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible emissions shall be determined with each emissions outlet in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from each emissions

outlet during the observation. For outdoor locations, the observer shall select a position where the sun is not directly in the observer's eyes. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. A certified opacity reader is not required for visible emissions observations.

(4) Compliance Certification:

- (a) If visible emissions are not present during the observation, the RO may certify that the source is in compliance with the applicable opacity requirement in 30 TAC § 111.111(a)(7) and (a)(7)(A)
- (b) However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2) or conduct the appropriate opacity test specified in 30 TAC § 111.111(a)(7)(B) as soon as practicable, but no later than 24 hours after observing visible emissions to determine if the source is in compliance with the opacity requirements. If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader

C. For visible emissions from all other sources not specified in 30 TAC § 111.111(a)(1), (4), or (7); the permit holder shall comply with the following requirements:

- (i) Title 30 TAC § 111.111(a)(8)(A) (relating to Requirements for Specified Sources)
- (ii) Title 30 TAC § 111.111(a)(8)(B)(i) or (ii)



- (iii) For a source subject to 30 TAC § 111.111(a)(8)(A), complying with 30 TAC § 111.111(a)(8)(B)(i) or (ii), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO<sub>x</sub>, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146:
- (1) An observation of visible emissions from a source which is required to comply with 30 TAC § 111.111(a)(8)(A) shall be conducted at least once during each calendar quarter unless the source is not operating for the entire quarter.
  - (2) Records of all observations shall be maintained.
  - (3) Visible emissions observations of sources operated during daylight hours shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations of sources operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible emissions shall be determined with each source in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from each source during the observation. For outdoor locations, the observer shall select a position where the sun is not directly in the observer's eyes. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. A certified opacity reader is not required for visible emissions observations.
  - (4) Compliance Certification:
    - (a) If visible emissions are not present during the observation, the RO may certify that the source is in compliance with the applicable opacity requirement in 30 TAC § 111.111(a)(8) and (a)(8)(A)
    - (b) However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2) or conduct the appropriate opacity test specified in 30 TAC § 111.111(a)(8)(B) as soon as practicable, but

no later than 24 hours after observing visible emissions to determine if the source is in compliance with the opacity requirements. If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader.

- D. Certification of opacity readers determining opacities under Method 9 (as outlined in 40 CFR Part 60, Appendix A) to comply with opacity monitoring requirements shall be accomplished by completing the Visible Emissions Evaluators Course, or approved agency equivalent, no more than 180 days before the opacity reading.
  - E. For emission units with contributions from uncombined water, the permit holder shall comply with the requirements of 30 TAC § 111.111(b).
  - F. Emission limits on nonagricultural processes, except for the steam generators specified in 30 TAC § 111.153, shall comply with the following requirements:
    - (i) Emissions of PM from any source may not exceed the allowable rates as required in 30 TAC § 111.151(a) (relating to Allowable Emissions Limits)
    - (ii) Sources with an effective stack height ( $h_e$ ) less than the standard effective stack height ( $H_e$ ), must reduce the allowable emission level by multiplying it by  $[h_e/H_e]^2$  as required in 30 TAC § 111.151(b)
    - (iii) Effective stack height shall be calculated by the equation specified in 30 TAC § 111.151(c)
4. Permit holder shall comply with the following 30 TAC Chapter 115, Subchapter C requirements:
- A. When filling gasoline storage vessels with a nominal capacity greater than 1,000 gallons (Stage I) at motor vehicle fuel dispensing facilities, which have dispensed no more than 25,000 gallons of gasoline in any calendar month after December 31, 2004, the permit holder shall comply with the following requirements specified in 30 TAC Chapter 115, Subchapter C:
    - (i) Title 30 TAC § 115.222(7) (relating to Control Requirements)

- (ii) Title 30 TAC § 115.222(3), as it applies to liquid gasoline leaks
  - (iii) Title 30 TAC § 115.224(1) (relating to Inspection Requirements), as it applies to liquid gasoline leaks
  - (iv) Title 30 TAC § 115.226(2)(C) (relating to Recordkeeping Requirements)
- B. When filling stationary gasoline storage containers with a nominal capacity less than or equal to 1,000 gallons at a Stage I motor vehicle fuel dispensing facility, the permit holder shall comply with the following requirements specified in 30 TAC Chapter 115, Subchapter C:
  - (i) Title 30 TAC § 115.222(7) (relating to Control Requirements)
  - (ii) Title 30 TAC § 115.222(3), as it applies to liquid gasoline leaks
  - (iii) Title 30 TAC § 115.224(1) (relating to Inspection Requirements), as it applies to liquid gasoline leaks
- 5. The permit holder shall comply with the following requirements for units subject to any subpart of 40 CFR Part 60, unless otherwise stated in the applicable subpart:
  - A. Title 40 CFR § 60.7 (relating to Notification and Recordkeeping)
  - B. Title 40 CFR § 60.8 (relating to Performance Tests)
  - C. Title 40 CFR § 60.11 (relating to Compliance with Standards and Maintenance Requirements)
  - D. Title 40 CFR § 60.12 (relating to Circumvention)
  - E. Title 40 CFR § 60.13 (relating to Monitoring Requirements)
  - F. Title 40 CFR § 60.14 (relating to Modification)
  - G. Title 40 CFR § 60.15 (relating to Reconstruction)
  - H. Title 40 CFR § 60.19 (relating to General Notification and Reporting Requirements)
- 6. The permit holder shall comply with the requirements of 30 TAC Chapter 113, Subchapter C, § 113.100 for units subject to any subpart of 40 CFR Part 63, unless otherwise stated in the applicable subpart.
- 7. For each gasoline dispensing facility, with a throughput of less than 10,000 gallons per month as specified in 40 CFR Part 63, Subpart CCCCCC, the permit

holder shall comply with the following requirements (Title 30 TAC, Subchapter C, § 113.1380 incorporated by reference):

- A. Title 40 CFR § 63.11111(e), for records of monthly throughput
- B. Title 40 CFR § 63.11111(i), for compliance due to increase of throughput
- C. Title 40 CFR § 63.11113(c), for compliance due to increase of throughput
- D. Title 40 CFR § 63.11115(a), for operation of the source
- E. Title 40 CFR § 63.11116(a) and (a)(1) - (4), for work practices
- F. Title 40 CFR § 63.11116(b), for records availability
- G. Title 40 CFR § 63.11116(d), for portable gasoline containers

### **Additional Monitoring Requirements**

- 8. Unless otherwise specified, the permit holder shall comply with the compliance assurance monitoring requirements as specified in the attached “CAM Summary” upon issuance of the permit. In addition, the permit holder shall comply with the following:
  - A. The permit holder shall comply with the terms and conditions contained in 30 TAC § 122.147 (General Terms and Conditions for Compliance Assurance Monitoring).
  - B. The permit holder shall report, consistent with the averaging time identified in the “CAM Summary,” deviations as defined by the deviation limit in the “CAM Summary.” Any monitoring data below a minimum limit or above a maximum limit, that is collected in accordance with the requirements specified in 40 CFR § 64.7(c), shall be reported as a deviation. Deviations shall be reported according to 30 TAC § 122.145 (Reporting Terms and Conditions).
  - C. The permit holder may elect to collect monitoring data on a more frequent basis and average the data, consistent with the averaging time specified in the “CAM Summary,” for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis. In no event shall data be collected and used in particular instances in order to avoid reporting deviations. All monitoring data shall be collected in accordance with the requirements specified in 40 CFR § 64.7(c).
  - D. The permit holder shall operate the monitoring, identified in the attached “CAM Summary,” in accordance with the provisions of 40 CFR § 64.7.

- E. The permit holder shall comply with either of the following requirements for any particulate matter capture system associated with the control device subject to CAM. If the results of the following inspections indicate that the capture system is not working properly, the permit holder shall promptly take necessary corrective action:
    - (i) Once per year the permit holder shall inspect any fan for proper operation and inspect the capture system used in compliance of CAM for cracks, holes, tears, and other defects; or
    - (ii) Once per year, the permit holder shall inspect for fugitive emissions escaping from the capture system in compliance of CAM by performing a visible emissions observation for a period of at least six minutes in accordance with 40 CFR Part 60, Appendix A, Test Method 22.
  - F. The permit holder shall comply with either of the following requirements for any bypass of the control device subject to CAM. If the results of the following inspections or monitoring indicate bypass of the control device, the permit holder shall promptly take necessary corrective actions and report a deviation:
    - (i) Install a flow indicator that is capable of recording flow, at least once every fifteen minutes, immediately downstream of each valve that if opened would allow a vent stream to bypass the control device and be emitted, either directly or indirectly, to the atmosphere; or
    - (ii) Once a month, the permit holder shall inspect the valves checking the position of the valves and the condition of the car seals. Identify all times when the car seal has been broken and the valve position has been changed to allow a vent stream to bypass the control device and be emitted, either directly or indirectly, to the atmosphere.
  - G. The permit holder shall comply with the requirements of 40 CFR § 70.6(a)(3)(ii)(A) and 30 TAC § 122.144(1)(A)-(F) for documentation of all required inspections.
9. The permit holder shall comply with the periodic monitoring requirements as specified in the attached “Periodic Monitoring Summary” upon issuance of the permit. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permit holder shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. The permit holder may elect to collect monitoring data on a more frequent basis and average the data, consistent with the averaging time specified

in the “Periodic Monitoring Summary,” for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis. In no event shall data be collected and used in particular instances to avoid reporting deviations. Deviations shall be reported according to 30 TAC § 122.145 (Reporting Terms and Conditions).

### **New Source Review Authorization Requirements**

10. Permit holder shall comply with the requirements of New Source Review authorizations issued or claimed by the permit holder for the permitted area, including permits, permits by rule, standard permits, flexible permits, special permits, permits for existing facilities including Voluntary Emissions Reduction Permits and Electric Generating Facility Permits issued under 30 TAC Chapter 116, Subchapter I, or special exemptions referenced in the New Source Review Authorization References attachment. These requirements:
  - A. Are incorporated by reference into this permit as applicable requirements
  - B. Shall be located with this operating permit
  - C. Are not eligible for a permit shield
11. The permit holder shall comply with the general requirements of 30 TAC Chapter 106, Subchapter A or the general requirements, if any, in effect at the time of the claim of any PBR.
12. The permit holder shall maintain records to demonstrate compliance with any emission limitation or standard that is specified in a permit by rule (PBR) or Standard Permit listed in the New Source Review Authorizations attachment. The records shall yield reliable data from the relevant time period that are representative of the emission unit’s compliance with the PBR or Standard Permit. These records may include, but are not limited to, production capacity and throughput, hours of operation, material safety data sheets (MSDS), chemical composition of raw materials, speciation of air contaminant data, engineering calculations, maintenance records, fugitive data, performance tests, capture/control device efficiencies, direct pollutant monitoring (CEMS, COMS, or PEMS), or control device parametric monitoring. These records shall be made readily accessible and available as required by 30 TAC § 122.144.
  - A. If applicable, monitoring of control device performance or general work practice standards shall be made in accordance with the TCEQ Periodic Monitoring Guidance document.
  - B. Any monitoring or recordkeeping data indicating noncompliance with the PBR or Standard Permit shall be considered and reported as a deviation according to 30 TAC § 122.145 (Reporting Terms and Conditions).

## **Compliance Requirements**

13. The permit holder shall certify compliance in accordance with 30 TAC § 122.146. The permit holder shall comply with 30 TAC § 122.146 using at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information. The certification period may not exceed 12 months and the certification must be submitted within 30 days after the end of the period being certified.
14. Use of Discrete Emission Credits to comply with the applicable requirements:
  - A. Unless otherwise prohibited, the permit holder may use discrete emission credits to comply with the following applicable requirements listed elsewhere in this permit:
    - (i) Title 30 TAC Chapter 115
    - (ii) Title 30 TAC Chapter 117
    - (iii) If applicable, offsets for Title 30 TAC Chapter 116
    - (iv) Temporarily exceed state NSR permit allowables
  - B. The permit holder shall comply with the following requirements in order to use the credit to comply with the applicable requirements:
    - (i) The permit holder must notify the TCEQ according to 30 TAC § 101.376(d)
    - (ii) The discrete emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 4
    - (iii) The executive director has approved the use of the discrete emission credits according to 30 TAC § 101.376(d)(1)(A)
    - (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.372(h) and 30 TAC Chapter 122

## **Protection of Stratospheric Ozone**

15. Permit holders at a site subject to Title VI of the FCAA Amendments shall meet the following requirements for protection of stratospheric ozone.
  - A. Any on site servicing, maintenance, and repair on refrigeration and nonmotor vehicle air-conditioning appliances using ozone-depleting

refrigerants or non-exempt substitutes shall be conducted in accordance with 40 CFR Part 82, Subpart F. Permit holders shall ensure that repairs on or refrigerant removal from refrigeration and nonmotor vehicle air-conditioning appliances using ozone-depleting refrigerants are performed only by properly certified technicians using certified equipment. Records shall be maintained as required by 40 CFR Part 82, Subpart F.

- B. Any on site servicing, maintenance, and repair of fleet vehicle air conditioning using ozone-depleting refrigerants shall be conducted in accordance with 40 CFR Part 82, Subpart B. Permit holders shall ensure that repairs or refrigerant removal are performed only by properly certified technicians using certified equipment. Records shall be maintained as required by 40 CFR Part 82, Subpart B.
- C. The permit holder shall comply with 40 CFR Part 82, Subpart F related to the disposal requirements for appliances using Class I or Class II (ozone-depleting) substances or non-exempt substitutes as specified in 40 CFR §§ 82.150 - 82.166 and the applicable Part 82 Appendices.
- D. The permit holder shall comply with 40 CFR Part 82, Subpart H related to Halon Emissions Reduction requirements as specified in 40 CFR § 82.250 - § 82.270 and the applicable Part 82 Appendices.

### **Permit Location**

- 16. The permit holder shall maintain a copy of this permit and records related to requirements listed in this permit on site.

### **Permit Shield (30 TAC § 122.148)**

- 17. A permit shield is granted for the emission units, groups, or processes specified in the attached "Permit Shield." Compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements listed in the attachment "Permit Shield." Permit shield provisions shall not be modified by the executive director until notification is provided to the permit holder. No later than 90 days after notification of a change in a determination made by the executive director, the permit holder shall apply for the appropriate permit revision to reflect the new determination. Provisional terms are not eligible for this permit shield. Any term or condition, under a permit shield, shall not be protected by the permit shield if it is replaced by a provisional term or condition or the basis of the term and condition changes.



## **Attachments**

**Applicable Requirements Summary**

**Additional Monitoring Requirements**

**Permit Shield**

**New Source Review Authorization References**

### **Applicable Requirements Summary**

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Note: A “none” entry may be noted for some emission sources in this permit’s “Applicable Requirements Summary” under the heading of “Monitoring and Testing Requirements” and/or “Recordkeeping Requirements” and/or “Reporting Requirements.” Such a notation indicates that there are no requirements for the indicated emission source as identified under the respective column heading(s) for the stated portion of the regulation when the emission source is operating under the conditions of the specified SOP Index Number. However, other relevant requirements pursuant to 30 TAC Chapter 122 including Recordkeeping Terms and Conditions (30 TAC § 122.144), Reporting Terms and Conditions (30 TAC § 122.145), and Compliance Certification Terms and Conditions (30 TAC § 122.146) continue to apply.

### Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
CASTER-MNTOR	Emission Points/Stationary Vents/Process Vents	N/A	R1111-1	30 TAC Chapter 111, Visible Emissions	No changing attributes.
ENGN-CASTR	SRIC Engines	N/A	63ZZZZ-1	40 CFR Part 63, Subpart ZZZZ	No changing attributes.
ENGN-IS	SRIC Engines	N/A	63ZZZZ-1	40 CFR Part 63, Subpart ZZZZ	No changing attributes.
ENGN-WATER	SRIC Engines	N/A	63ZZZZ-1	40 CFR Part 63, Subpart ZZZZ	No changing attributes.
FFURNBHSTK	Emission Points/Stationary Vents/Process Vents	N/A	R1111-3	30 TAC Chapter 111, Nonagricultural Processes	No changing attributes.
FFURNBHSTK	Emission Points/Stationary Vents/Process Vents	N/A	R1111-1	30 TAC Chapter 111, Visible Emissions	No changing attributes.
FURN-F	Steel Plant Unit	N/A	60AAA-1	40 CFR Part 60, Subpart AAa	No changing attributes.
FURN-F	Steel Plant Unit	N/A	60AAA-2	40 CFR Part 60, Subpart AAa	No changing attributes.
FURN-F	Steel Plant Unit	N/A	63YYYYY-2	40 CFR Part 63, Subpart YYYYY	No changing attributes.

### Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
GRP-LRG TWR	Emission Points/Stationary Vents/Process Vents	CASTER-TWR, CASTER-TWR1, MILL-TWR-1, MILL-TWR-2, TWR-A-1, TWR-C- 1	R1111-1	30 TAC Chapter 111, Visible Emissions	No changing attributes.
K061 DUST	Steel Plant Unit	N/A	60AAA-3	40 CFR Part 60, Subpart AAa	No changing attributes.
PROSCRAP	Miscellaneous Units	N/A	63YYYYY-1	40 CFR Part 63, Subpart YYYYY	No changing attributes.
RABAGHOUSE	Emission Points/Stationary Vents/Process Vents	N/A	R1111-3	30 TAC Chapter 111, Nonagricultural Processes	No changing attributes.
RABAGHOUSE	Emission Points/Stationary Vents/Process Vents	N/A	R1111-1	30 TAC Chapter 111, Visible Emissions	No changing attributes.

## Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
CASTER-MNTOR	EP	R1111-1	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(1)(C) § 111.111(a)(1)(E)	Visible emissions from any stationary vent shall not exceed an opacity of 15% averaged over a six minute period for any source with a total flow rate of at least 100,000 acfm unless a CEMS is installed.	[G]§ 111.111(a)(1)(F) ** See Periodic Monitoring Summary	None	None
ENGN-CASTR	EU	63ZZZZ-1	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6603 The permit holder shall comply with the applicable limitation, standard and/or equipment specification requirements of 40 CFR Part 63, Subpart ZZZZ	The permit holder shall comply with the applicable requirements of 40 CFR Part 63, Subpart ZZZZ	The permit holder shall comply with the applicable monitoring and testing requirements of 40 CFR Part 63, Subpart ZZZZ	The permit holder shall comply with the applicable recordkeeping requirements of 40 CFR Part 63, Subpart ZZZZ	The permit holder shall comply with the applicable reporting requirements of 40 CFR Part 63, Subpart ZZZZ
ENGN-IS	EU	63ZZZZ-1	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6603 The permit holder shall comply with the applicable limitation, standard and/or equipment specification requirements of 40 CFR Part 63, Subpart ZZZZ	The permit holder shall comply with the applicable requirements of 40 CFR Part 63, Subpart ZZZZ	The permit holder shall comply with the applicable monitoring and testing requirements of 40 CFR Part 63, Subpart ZZZZ	The permit holder shall comply with the applicable recordkeeping requirements of 40 CFR Part 63, Subpart ZZZZ	The permit holder shall comply with the applicable reporting requirements of 40 CFR Part 63, Subpart ZZZZ

## Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
ENGN-WATER	EU	63ZZZZ-1	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6603 The permit holder shall comply with the applicable limitation, standard and/or equipment specification requirements of 40 CFR Part 63, Subpart ZZZZ	The permit holder shall comply with the applicable requirements of 40 CFR Part 63, Subpart ZZZZ	The permit holder shall comply with the applicable monitoring and testing requirements of 40 CFR Part 63, Subpart ZZZZ	The permit holder shall comply with the applicable recordkeeping requirements of 40 CFR Part 63, Subpart ZZZZ	The permit holder shall comply with the applicable reporting requirements of 40 CFR Part 63, Subpart ZZZZ
FFURNBHS TK	EP	R1111-3	PM	30 TAC Chapter 111, Nonagricultural Processes	§ 111.151(a) § 111.151(c)	No person may cause, suffer, allow, or permit emissions of particulate matter from any source to exceed the allowable rates specified in Table 1 as follows, except as provided by §111.153 of this title (relating to Emissions Limits for Steam Generators).	** See CAM Summary	None	None
FFURNBHS TK	EP	R1111-1	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(1)(C) § 111.111(a)(1)(E)	Visible emissions from any stationary vent shall not exceed an opacity of 15% averaged over a six minute period for any source with a total flow rate of at least 100,000 acfm unless a CEMS is installed.	[G]§ 111.111(a)(1)(F) ** See CAM Summary	None	None

## Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
FURN-F	EU	60AAA-1	PM	40 CFR Part 60, Subpart AAa	§ 60.272a(a)(1)	Gases which exit from a control device and contain particulate matter in excess of 12 mg/dscm (0.0052 gr/dscf) shall not be discharged into the atmosphere.	§ 60.274a(b) § 60.274a(d) [G]§ 60.274a(h) § 60.275a(a) § 60.275a(b) § 60.275a(b)(1) § 60.275a(d) § 60.275a(e) § 60.275a(e)(1) § 60.275a(e)(2) § 60.275a(e)(4) § 60.275a(f) § 60.275a(g) § 60.275a(h) § 60.275a(h)(1) § 60.275a(j)	§ 60.274a(a) § 60.274a(a)(1) § 60.274a(b) § 60.274a(d) § 60.276a(a)	[G]§ 60.276a(f)
FURN-F	EU	60AAA-1	PM (Opacity)	40 CFR Part 60, Subpart AAa	§ 60.272a(a)(2)	Gases which exit from a control device and exhibit 3 percent opacity or greater shall not be discharged into the atmosphere.	§ 60.273a(c) § 60.273a(e) § 60.273a(e)(1) § 60.273a(e)(2) § 60.273a(e)(3) [G]§ 60.273a(e)(4) § 60.273a(e)(5) [G]§ 60.273a(e)(6) § 60.273a(e)(7) § 60.273a(e)(8) [G]§ 60.273a(f) § 60.273a(g) [G]§ 60.274a(h) § 60.275a(d) § 60.275a(e) § 60.275a(e)(3) § 60.275a(e)(4) § 60.275a(j)	§ 60.273a(c) § 60.273a(e)(2) § 60.276a(a) [G]§ 60.276a(h)	[G]§ 60.273a(e)(4) [G]§ 60.273a(e)(6) § 60.276a(b) [G]§ 60.276a(f)

## Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
FURN-F	EU	60AAA-2	PM (Opacity)	40 CFR Part 60, Subpart AAa	§ 60.272a(a)(3)	Gases which exit from a shop and exhibit 6 percent opacity or greater due to the operations of any affected EAF(s) or AOD vessel(s) shall not be discharged into the atmosphere.	§ 60.273a(d) § 60.274a(a)(2) § 60.274a(c) § 60.274a(f) [G]§ 60.274a(h) § 60.275a(c) § 60.275a(d) § 60.275a(e) § 60.275a(e)(3) § 60.275a(e)(4) § 60.275a(f) § 60.275a(i) § 60.275a(j)	§ 60.273a(d) § 60.274a(a) § 60.274a(a)(2) § 60.274a(c) § 60.276a(a) § 60.276a(g)	§ 60.276a(c) [G]§ 60.276a(f) § 60.276a(g)
FURN-F	EU	63YYYY-2	PM	40 CFR Part 63, Subpart YYYY	§ 63.10686(b)(1) § 63.10686(a) § 63.10686(d)(6)	Except as provided in paragraph (c) of this section, you must not discharge or cause the discharge into the atmosphere from an EAF or AOD vessel any gases which exit from a control device and contain in excess of 0.0052 grains of PM per dry standard cubic foot (gr/dscf).	§ 63.10686(d)(6) § 63.10686(e) ** See CAM Summary	§ 63.10686(e)	§ 63.10686(e)
FURN-F	EU	63YYYY-2	PM (Opacity)	40 CFR Part 63, Subpart YYYY	§ 63.10686(b)(2) § 63.10686(a) § 63.10686(d)(6)	Except as provided in paragraph (c) of this section, you must not discharge or cause the discharge into the atmosphere from an EAF or AOD vessel any gases which exit from a melt shop and, due solely to the operations of any affected EAF(s) or AOD vessel(s), exhibit 6 percent opacity or greater.	§ 63.10686(d)(6) § 63.10686(e) ** See CAM Summary	§ 63.10686(e)	§ 63.10686(e)



## Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
GRP-LRGTW	EP	R1111-1	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(1)(C) § 111.111(a)(1)(E)	Visible emissions from any stationary vent shall not exceed an opacity of 15% averaged over a six minute period for any source with a total flow rate of at least 100,000 acfm unless a CEMS is installed.	[G]§ 111.111(a)(1)(F) ** See Periodic Monitoring Summary	None	None
Ko61 DUST	EU	60AAA-3	PM (Opacity)	40 CFR Part 60, Subpart AAa	§ 60.272a(b)	On or after the date of the performance test (by §60.8)no owner or operator shall allow discharge into the atmosphere from dust handling system any gases that exhibit 10 percent opacity or greater.	§ 60.273a(b) § 60.275a(d) § 60.275a(e) § 60.275a(e)(3) ** See Periodic Monitoring Summary	None	None
PROSCRAP	PRO	63YYYY-1	HAPS	40 CFR Part 63, Subpart YYYYY	§ 63.10685(a) [G]§ 63.10685(a)(1) [G]§ 63.10685(b)(2) § 63.10685(b)(4)	For metallic scrap utilized in the EAF at your facility, you must comply with the requirements of §63.10685(a)(1).	None	[G]§ 63.10685(b)(2)(iv) § 63.10685(a)(1) § 63.10685(b)(4) § 63.10685(c)(2)	[G]§ 63.10685(b)(2) § 63.10685(b)(4) § 63.10685(c)(3)
RABAGHOU SE	EP	R1111-3	PM	30 TAC Chapter 111, Nonagricultural Processes	§ 111.151(a) § 111.151(c)	No person may cause, suffer, allow, or permit emissions of particulate matter from any source to exceed the allowable rates specified in Table 1 as follows, except as provided by §111.153 of this title (relating to Emissions Limits for Steam Generators).	** See CAM Summary	None	None

### Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
RABAGHOU SE	EP	R1111-1	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(1)(C) § 111.111(a)(1)(E)	Visible emissions from any stationary vent shall not exceed an opacity of 15% averaged over a six minute period for any source with a total flow rate of at least 100,000 acfm unless a CEMS is installed.	[G]§ 111.111(a)(1)(F) ** See CAM Summary	None	None

**Additional Monitoring Requirements**

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## CAM Summary

Unit/Group/Process Information	
ID No.: FFURNBHSTK	
Control Device ID No.: FFURNBHSTK	Control Device Type: Fabric Filter
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111-1
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(C)
Monitoring Information	
Indicator: Opacity	
Minimum Frequency: Daily	
Averaging Period: Six minutes	
Deviation Limit: Maximum opacity of 15% except during periods defined in 30 TAC § 111.111(a)(1)(E).	
<p>CAM Text: To determine if the source is in compliance with opacity requirements, an opacity test shall be conducted daily in accordance with 40 CFR Part 60, Subpart AAa, § 60.273a(c). If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2). If the observations cannot be conducted due to weather conditions, the date, time, and specific conditions shall be recorded.</p> <p>Opacity shall be monitored, unless the emission unit venting to this emission point does not operate.</p> <p>The opacity test must be performed by a certified opacity reader.</p>	

## CAM Summary

<b>Unit/Group/Process Information</b>	
ID No.: FFURNBHSTK	
Control Device ID No.: FFURNBHSTK	Control Device Type: Fabric Filter
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 111, Nonagricultural Processes	SOP Index No.: R1111-3
Pollutant: PM	Main Standard: § 111.151(a)
<b>Monitoring Information</b>	
Indicator: Opacity	
Minimum Frequency: Daily	
Averaging Period: Six minutes	
Deviation Limit: Maximum opacity = 3%	
<p>CAM Text: The 3%-opacity deviation limit is based on the 3% opacity limits specified in 40 CFR Part 60, Subpart AAa and in NSR Permit No. 8248. Because the particulate mass emission limits 40 CFR Part 60, Subpart AAa and in NSR Permit No. 8248 are more stringent than the lb/hr mass limit specified in 30 TAC §111.151(a), demonstrating compliance with the 3% opacity limit also demonstrates compliance with the lb/hr limit in 30 TAC § 111.151(a).</p> <p>To determine if the source is in compliance with the PM requirements, an opacity test shall be conducted daily in accordance with 40 CFR Part 60, Subpart AAa, § 60.273a(c). If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable PM requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this as a deviation on the next deviation report as required under 30 TAC § 122.145(2). If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded.</p> <p>Opacity shall be monitored, unless the emission unit venting to this emission point does not operate.</p> <p>The opacity test must be performed by a certified opacity reader.</p>	

## CAM Summary

Unit/Group/Process Information	
ID No.: FURN-F	
Control Device ID No.: FFURNBHSTK	Control Device Type: Fabric Filter
Control Device ID No.: RABAGHOUSE	Control Device Type: Fabric Filter
Applicable Regulatory Requirement	
Name: 40 CFR Part 63, Subpart YYYYYY	SOP Index No.: 63YYYYYY-2
Pollutant: PM	Main Standard: § 63.10686(b)(1)
Monitoring Information	
Indicator: Opacity	
Minimum Frequency: Once per day	
Averaging Period: Six minutes	
Deviation Limit: 3% opacity limit for the exhausts of the baghouses receiving emissions from the electric arc furnace	
<p>CAM Text: The 3%-opacity deviation limit for the exhausts of the baghouses receiving from the electric arc furnace is based on the 3% opacity limit specified in 40 CFR Part 60, Subpart AAa. Because the particulate grain loading emission limit in 40 CFR Part 60, Subpart AAa is identical to the grain loading limit specified in 40 CFR Part 63, Subpart YYYYYY, demonstrating compliance with the 3% opacity limit also demonstrates compliance with the grain loading limit specified in 40 CFR Part 63, Subpart YYYYYY.</p> <p>To determine if the source is in compliance with PM requirements, an opacity test shall be conducted daily in accordance with 40 CFR Part 60, Subpart AAa, §60.273a(c). If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable PM requirement. However, if the an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC §122.145(2). If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded.</p> <p>Opacity shall be monitored, unless the emission unit venting to the specified emission points does not operate during the day.</p> <p>The opacity test must be performed by a certified opacity reader.</p>	

## CAM Summary

<b>Unit/Group/Process Information</b>	
ID No.: FURN-F	
Control Device ID No.: FFURNBHSTK	Control Device Type: Fabric Filter
Control Device ID No.: RABAGHOUSE	Control Device Type: Fabric Filter
<b>Applicable Regulatory Requirement</b>	
Name: 40 CFR Part 63, Subpart YYYYY	SOP Index No.: 63YYYYY-2
Pollutant: PM(Opacity)	Main Standard: § 63.10686(b)(2)
<b>Monitoring Information</b>	
Indicator: Opacity	
Minimum Frequency: Daily	
Averaging Period: Six minutes	
Deviation Limit: 6% opacity limit for emissions from openings in the Melt Shop building	
<p>CAM Text: To determine if the source is in compliance with opacity requirements, an opacity test shall be conducted daily in accordance with 40 CFR Part 60, Subpart AAa, § 60.273a(d). If an opacity test is performed and the source is determined to be in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2). If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded.</p> <p>Opacity shall be monitored, unless the emission unit venting to the specified emission points does not operate during the quarter.</p> <p>The opacity test must be performed by a certified opacity reader.</p>	

## CAM Summary

<b>Unit/Group/Process Information</b>	
ID No.: RABAGHOUSE	
Control Device ID No.: RABAGHOUSE	Control Device Type: Fabric Filter
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111-1
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(C)
<b>Monitoring Information</b>	
Indicator: Opacity	
Minimum Frequency: Daily	
Averaging Period: Six minutes	
Deviation Limit: Maximum opacity of 15% except during periods defined in 30 TAC § 111.111(a)(1)(E).	
<p>CAM Text: To determine if the source is in compliance with opacity requirements, an opacity test shall be conducted daily in accordance with 40 CFR Part 60, Subpart AAa, § 60.273a(c). If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if the an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2). If the observations cannot be made due to weather conditions, the date, time, and specific weather conditions shall be recorded.</p> <p>Opacity shall be monitored, unless the emission unit venting to this emission point does not operate.</p> <p>The opacity test must be performed by a certified opacity reader.</p>	



## CAM Summary

Unit/Group/Process Information	
ID No.: RABAGHOUSE	
Control Device ID No.: RABAGHOUSE	Control Device Type: Fabric Filter
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Nonagricultural Processes	SOP Index No.: R1111-3
Pollutant: PM	Main Standard: § 111.151(a)
Monitoring Information	
Indicator: Opacity	
Minimum Frequency: Daily	
Averaging Period: Six minutes	
Deviation Limit: Maximum opacity = 3%	
<p>CAM Text: The 3%-opacity deviation limit is based on the 3% opacity limit specified in 40 CFR Part 60, Subpart AAa and in NSR Permit No. 8248. Because the particulate mass emission limits in 40 CFR Part 60, Subpart AAa and in NSR Permit 8248 are more stringent than the lb/hr mass limit specified in 30 TAC § 111.151(a), demonstrating compliance with the 3% opacity limit also demonstrates compliance with the lb/hr limit in 30 TAC § 111.151(a).</p> <p>To determine if the source is in compliance with PM requirements, an opacity test shall be conducted daily in accordance with 40 CFR Part 60, Subpart AAa, § 60.273a(c). If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable PM requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2). If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded.</p> <p>Opacity shall be monitored, unless the emission unit venting to this emission point does not operate.</p> <p>The opacity test must be performed by a certified opacity reader.</p>	

## Periodic Monitoring Summary

<b>Unit/Group/Process Information</b>	
ID No.: CASTER-MNTOR	
Control Device ID No.: N/A	Control Device Type: N/A
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111-1
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(C)
<b>Monitoring Information</b>	
Indicator: Opacity	
Minimum Frequency: Once per month	
Averaging Period: Six-minutes	
Deviation Limit: Opacity exceeds 15%.	
<p>Periodic Monitoring Text: Opacity shall be monitored, by a certified observer, for at least one, six-minute period in accordance with Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60), Appendix A, Test Method 9. Any opacity readings above the deviation limit shall be reported as a deviation.</p>	

## Periodic Monitoring Summary

Unit/Group/Process Information	
ID No.: GRP-LRGTTWR	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111-1
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(C)
Monitoring Information	
Indicator: Visible Emissions	
Minimum Frequency: Quarterly	
Averaging Period: Six minutes	
Deviation Limit: Maximum opacity of 15% except during period defined in 30 TAC § 111.111(a)(1)(E).	
<p>Periodic Monitoring Text: Visible emissions observations shall be made and recorded at least once during each calendar quarter unless the emission unit venting to this emission point does not operate during the quarter. Records of all observations shall be maintained.</p> <p>Visible emissions observations shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations shall be made during times when the activities described in 30 TAC § 111.111(a)(1)(E) are not occurring. Visible emissions shall be determined with each stationary vent in clear view of the observer. The observer shall be at least 15 feet, but no more than 0.25 mile away from each stationary vent during the observation. The observer shall select a position where the sun is not directly in the observer's eyes. When condensed water vapor is present in the plume as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of the water vapor. A certified opacity reader is not required for visible emissions observations.</p> <p>If visible emissions are not present during the observation, the RO may certify that the source is in compliance. However, if visible emissions are present during the observation, the permit holder shall either list the occurrence as a deviation on the next deviation report, as required under 30 TAC § 122.145(2), or conduct the appropriate opacity test specified in 30 TAC § 111.111(a)(1)(F) to determine if the source is in compliance with opacity requirements. If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader.</p>	

## Periodic Monitoring Summary

Unit/Group/Process Information	
ID No.: Ko61 DUST	
Control Device ID No.: Ko61 DUST	Control Device Type: Fabric Filter
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart AAa	SOP Index No.: 60AAA-3
Pollutant: PM (Opacity)	Main Standard: § 60.272a(b)
Monitoring Information	
Indicator: Opacity	
Minimum Frequency: Once per calendar quarter	
Averaging Period: N/A	
Deviation Limit: Maximum opacity = 10%	
<p>Periodic Monitoring Text: Visible emissions observations of the fabric filter vent and building openings shall be made and recorded at least once during each calendar quarter unless the dust handling system does not operate during the quarter. Records of all observations shall be maintained.</p> <p>Visible emissions shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations shall be made during routine operations. Visible emissions shall be determined with each emission point in clear view of the observer. The observer shall be at least 15 feet, but no more than 0.25 mile, away from each emission point during the observation. The observer shall select a position where the sun is not directly in the observer's eyes. When condensed water vapor is present within the plume as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of the water vapor. A certified opacity reader is not required for visible emissions observations.</p> <p>If visible emissions are not present during the observation, the RO may certify that the source is in compliance. However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report, as required under 30 TAC §122.145(2), or conduct an opacity test in accordance with 40 CFR 60, Appendix A, Test Method 9 to determine if the source is in compliance with opacity requirements. If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC §122.145(2). The opacity test must be performed by a certified opacity reader.</p>	

**Permit Shield**

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## Permit Shield

The Executive Director of the TCEQ has determined that the permit holder is not required to comply with the specific regulation(s) identified for each emission unit, group, or process in this table.

Unit/Group/Process		Regulation	Basis of Determination
ID No.	Group/Inclusive Units		
DIESELUNLD	N/A	30 TAC Chapter 115, Loading and Unloading of VOC	These operations involve VOCs other than gasoline and are not located in Aransas, Bexar, Calhoun, Gregg, Matagorda, Nueces, San Patricio, Travis, or Victoria Counties
EMULSNUNLD	N/A	30 TAC Chapter 115, Loading and Unloading of VOC	These operations involve VOCs other than gasoline and are not located in Aransas, Bexar, Calhoun, Gregg, Matagorda, Nueces, San Patricio, Travis, or Victoria Counties
ENGN-CASTR	N/A	40 CFR Part 60, Subpart IIII	The stationary CI ICE commenced construction before July 11, 2005 and has not been modified or reconstructed since July 11, 2005.
ENGN-IS	N/A	40 CFR Part 60, Subpart IIII	The stationary CI ICE commenced construction before July 11, 2005 and has not been modified or reconstructed since July 11, 2005.
ENGN-WATER	N/A	40 CFR Part 60, Subpart IIII	The stationary CI RICE commenced construction before July 11, 2005 and has not been modified or reconstructed since July 11, 2005.
FURN-F	N/A	30 TAC Chapter 112, Sulfur Compounds	This unit does not fire liquid fuel.

## Permit Shield

The Executive Director of the TCEQ has determined that the permit holder is not required to comply with the specific regulation(s) identified for each emission unit, group, or process in this table.

Unit/Group/Process		Regulation	Basis of Determination
ID No.	Group/Inclusive Units		
G1	N/A	40 CFR Part 60, Subpart Kb	Tank capacity < 39,900 and true vapor pressure < 2.2 psia.
G2	N/A	40 CFR Part 60, Subpart Kb	Storage tank capacity is less than 19,600 gallons.
GASOL-UNLD	N/A	30 TAC Chapter 115, Loading and Unloading of VOC	This operation is conducted at a motor vehicle fuel dispensing facility, as defined in 30 TAC Section 101.1
G-LUBE-UNLD	N/A	30 TAC Chapter 115, Loading and Unloading of VOC	These operations involve VOCs other than gasoline and are not located in Aransas, Bexar, Calhoun, Gregg, Matagorda, Nueces, San Patricio, Travis, or Victoria Counties
GLYCOLUNLD	N/A	30 TAC Chapter 115, Loading and Unloading of VOC	These operations involve VOCs other than gasoline and are not located in Aransas, Bexar, Calhoun, Gregg, Matagorda, Nueces, San Patricio, Travis, or Victoria Counties
GRP-LRGTTWR	CASTER-TWR, CASTER-TWR1, MILL-TWR-1, MILL-TWR-2, TWR-A-1, TWR-C-1	40 CFR Part 63, Subpart Q	The cooling tower does not use chromium-based water treatment chemicals.
GRP-SMLTWR	COOLBEDTWR, SHDR-TWR1, TWR-B	40 CFR Part 63, Subpart Q	The cooling tower does not use chromium-based water treatment chemicals.

## Permit Shield

The Executive Director of the TCEQ has determined that the permit holder is not required to comply with the specific regulation(s) identified for each emission unit, group, or process in this table.

Unit/Group/Process		Regulation	Basis of Determination
ID No.	Group/Inclusive Units		
GRP-WASHER	PARTWASH1, PARTWASH10, PARTWASH11, PARTWASH12, PARTWASH13, PARTWASH14, PARTWASH15, PARTWASH16, PARTWASH2, PARTWASH3, PARTWASH4, PARTWASH5, PARTWASH6, PARTWASH7, PARTWASH8, PARTWASH9	30 TAC Chapter 115, Degreasing Processes	A remote reservoir cold solvent cleaner that uses solvent with a TVP equal to or less than 0.6 psia measured at 100 deg. F and which has a drain area less than 16 square inches for which waste is properly disposed of in enclosed containers is exempt.



## Permit Shield

The Executive Director of the TCEQ has determined that the permit holder is not required to comply with the specific regulation(s) identified for each emission unit, group, or process in this table.

Unit/Group/Process		Regulation	Basis of Determination
ID No.	Group/Inclusive Units		
GRP-WASHER	PARTWASH1, PARTWASH10, PARTWASH11, PARTWASH12, PARTWASH13, PARTWASH14, PARTWASH15, PARTWASH16, PARTWASH2, PARTWASH3, PARTWASH4, PARTWASH5, PARTWASH6, PARTWASH7, PARTWASH8, PARTWASH9	40 CFR Part 63, Subpart T	The parts washer solvent contains a total concentration less than 5% by weight of halogenated hazardous air pollutants.
HYDRL-UNLD	N/A	30 TAC Chapter 115, Loading and Unloading of VOC	These operations involve VOCs other than gasoline and are not located in Aransas, Bexar, Calhoun, Gregg, Matagorda, Nueces, San Patricio, Travis, or Victoria Counties
LMS	N/A	30 TAC Chapter 112, Sulfur Compounds	This unit does not fire liquid fuel.
LMS	N/A	40 CFR Part 60, Subpart AAa	This unit is not an electric arc furnace, as defined in NSPS Subpart AAa

## Permit Shield

The Executive Director of the TCEQ has determined that the permit holder is not required to comply with the specific regulation(s) identified for each emission unit, group, or process in this table.

Unit/Group/Process		Regulation	Basis of Determination
ID No.	Group/Inclusive Units		
M2	N/A	40 CFR Part 60, Subpart Kb	Storage tank capacity is less than 19,812 gallons.
M3	N/A	40 CFR Part 60, Subpart Kb	Storage tank capacity is less than 19,812 gallons.
M4	N/A	40 CFR Part 60, Subpart Kb	Storage tank capacity is less than 19,812 gallons.
M5	N/A	40 CFR Part 60, Subpart Kb	Storage tank capacity is less than 19,812 gallons.
MAINTPAINT	N/A	40 CFR Part 63, Subpart MMMM	Surface coating associated with janitorial, building, facility maintenance operations are not subject to the rule.
M-LUBE-UNLD	N/A	30 TAC Chapter 115, Loading and Unloading of VOC	These operations involve VOCs other than gasoline and are not located in Aransas, Bexar, Calhoun, Gregg, Matagorda, Nueces, San Patricio, Travis, or Victoria Counties
MOTOILUNLD	N/A	30 TAC Chapter 115, Loading and Unloading of VOC	These operations involve VOCs other than gasoline and are not located in Aransas, Bexar, Calhoun, Gregg, Matagorda, Nueces, San Patricio, Travis, or Victoria Counties

## Permit Shield

The Executive Director of the TCEQ has determined that the permit holder is not required to comply with the specific regulation(s) identified for each emission unit, group, or process in this table.

Unit/Group/Process		Regulation	Basis of Determination
ID No.	Group/Inclusive Units		
MS1	N/A	40 CFR Part 60, Subpart Kb	Storage tank capacity is less than 19,812 gallons.
MS3	N/A	40 CFR Part 60, Subpart Kb	Storage tank capacity is less than 19,812 gallons.
PAINTSHOP	N/A	40 CFR Part 63, Subpart Mmmm	The site is not a major source of HAPs.
REHEAT	N/A	30 TAC Chapter 112, Sulfur Compounds	This unit does not fire liquid fuel.
SEPARATORS	N/A	40 CFR Part 63, Subpart VV	The site of which these units are part is not an affected facility under any of the VOC-water separator standards referenced in MACT VV.
USED OIL LDG	N/A	30 TAC Chapter 115, Loading and Unloading of VOC	These operations involve VOCs other than gasoline and are not located in Aransas, Bexar, Calhoun, Gregg, Matagorda, Nueces, San Patricio, Travis, or Victoria Counties
Y1	N/A	40 CFR Part 60, Subpart Kb	Storage tank capacity is less than 19,812 gallons.
Y2	N/A	40 CFR Part 60, Subpart Kb	Storage tank capacity is less than 19,812 gallons.

**New Source Review Authorization References**

**New Source Review Authorization References ..... 43**

**New Source Review Authorization References by Emission Unit..... 45**

## New Source Review Authorization References

The New Source Review authorizations listed in the table below are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

<b>Prevention of Significant Deterioration (PSD) Permits</b>	
PSD Permit No.: PSDTX708M6	Issuance Date: 07/24/2014
<b>Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.</b>	
Authorization No.: 8248	Issuance Date: 07/24/2014
<b>Permits By Rule (30 TAC Chapter 106) for the Application Area</b>	
Number: 106.144	Version No./Date: 09/04/2000
Number: 106.261	Version No./Date: 09/04/2000
Number: 106.261	Version No./Date: 11/01/2003
Number: 106.262	Version No./Date: 09/04/2000
Number: 106.263	Version No./Date: 11/01/2001
Number: 106.472	Version No./Date: 09/04/2000
Number: 106.473	Version No./Date: 09/04/2000
Number: 106.476	Version No./Date: 09/04/2000
Number: 106.478	Version No./Date: 09/04/2000
Number: 106.532	Version No./Date: 09/04/2000
Number: 5	Version No./Date: 09/12/1989
Number: 14	Version No./Date: 09/12/1989
Number: 14	Version No./Date: 07/20/1992
Number: 39	Version No./Date: 09/12/1989
Number: 40	Version No./Date: 09/12/1989
Number: 42	Version No./Date: 09/12/1989
Number: 51	Version No./Date: 09/12/1989
Number: 61	Version No./Date: 09/12/1989
Number: 70	Version No./Date: 09/12/1989
Number: 75	Version No./Date: 08/30/1988
Number: 103	Version No./Date: 09/12/1989
Number: 106	Version No./Date: 09/12/1989

### **New Source Review Authorization References**

The New Source Review authorizations listed in the table below are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Number: 107	Version No./Date: 09/12/1989
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### New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization
CASTER-MNTOR	Caster Roof Monitor Vent	8248, PSDTX708M6
CASTER-TWR1	Caster Spray Side Stream Cooling Tower	8248, PSDTX708M6
CASTER-TWR	Caster Spray Cooling Tower	8248, PSDTX708M6
COOLBEDTWR	Rolling Mill Cooling Bed Cooling Tower	8248, PSDTX708M6
DIESELUNLD	Unloading to Vehicle Diesel-Dispensing Storage TK	14/07/20/1992, 14/09/12/1989
EMULSNUNLD	Unloading Asphalt Emulsion Storage Tank	51/09/12/1989
ENGN-CASTR	1600 Hp Caster/LMS, Emergency Generator Engine	8248, PSDTX708M6
ENGN-IS	300 Hp IS UPS, Emergency Generator Engine	8248, PSDTX708M6
ENGN-WATER	120 Hp Water Emergency Stand-By Engine	8248, PSDTX708M6
FFURNBHSTK	Neg.-Press. Baghouse Stack - Melt Shop Ventilation	8248, PSDTX708M6
FURN-F	Electric Arc Furnace	8248, PSDTX708M6
G1	25,000 Gallon Diesel Fuel Storage Tank	106.472/09/04/2000
G2	5,000 Gallon Gasoline Storage Tank	106.473/09/04/2000
GASOL-UNLD	Unloading to Vehicle Gas-Dispensing Storage Tank	14/07/20/1992
G-LUBE-UNLD	Unloading to Gear Lubricant Storage Tanks	51/09/12/1989
GLYCOLUNLD	Unloading to Glycol Fluid Storage Tank	51/09/12/1989
HYDRL-UNLD	Unloading to Hydraulic Oil Storage Tanks	51/09/12/1989
Ko61 DUST	EAF Dust Handling	8248, PSDTX708M6

### New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization
LMS	Ladle Metallurgy Station	8248, PSDTX708M6
M2	8,000 Gallon Hydraulic Oil Storage Tank	106.472/09/04/2000
M3	8,000 Gallon Glycol Fluid Storage Tank	51/09/12/1989
M4	8,000 Gallon Gear Lubricant Storage Tank	106.472/09/04/2000
M5	8,000 Gallon Gear Lubricant Storage Tank	106.472/09/04/2000
MAINTPAINT	Misc Janitorial, Bdlg., Facility Maint. Painting	106.263/11/01/2001
MILL-TWR-1	Rolling Mill Cooling Tower	8248, PSDTX708M6
MILL-TWR-2	Rolling Mill Contact Water System Cooling Tower	8248, PSDTX708M6
M-LUBE-UNLD	Unloading To Mold Lubricant Storage Tank	51/09/12/1989
MOTOILUNLD	Unloading To Motor Oil Storage Tank	51/09/12/1989
MS1	6,000-Gallon Mold Lubricant Storage Tank	51/09/12/1989
MS3	5,000 Gal Mold Lube Storage Tank	106.472/09/04/2000
PAINTSHOP	Vehicle Maintenance Paint Shop	8248, PSDTX708M6
PARTWASH10	Parts Washer - Machine Shop #1	107/09/12/1989
PARTWASH11	Parts Washer - Mechanical Day Maintenance #1	107/09/12/1989
PARTWASH12	Parts Washer - Guideshop #1	107/09/12/1989
PARTWASH13	Parts Washer - Guideshop #2	107/09/12/1989
PARTWASH14	Parts Washer - Guideshop #3	107/09/12/1989



### New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization
PARTWASH15	Parts Washer - Guideshop #4	107/09/12/1989
PARTWASH16	Parts Washer - Guideshop #5	107/09/12/1989
PARTWASH1	Parts Washer - Mold Repair Shop #1	107/09/12/1989
PARTWASH2	Parts Washer - Mill Tunnel #1	107/09/12/1989
PARTWASH3	Parts Washer - Upper Mill Tunnel #1	107/09/12/1989
PARTWASH4	Parts Washer - Backshear #1	107/09/12/1989
PARTWASH5	Parts Washer - Electric Shop #1	107/09/12/1989
PARTWASH6	Parts Washer - Machine Shop #1	107/09/12/1989
PARTWASH7	Parts Washer - Day Maintenance #1	107/09/12/1989
PARTWASH8	Parts Washer - Project Shop #1	107/09/12/1989
PARTWASH9	Parts Washer - Hydraulic Shop #1	107/09/12/1989
PROSCRAP	Scrap Selection Process	8248, PSDTX708M6
RABAGHOUSE	RA Baghouse Vent - EAF DEC/Melt Shop Ventilation	8248, PSDTX708M6
REHEAT	Reheat Furnace	8248, PSDTX708M6
SEPARATORS	VOC/Water Separators	61/09/12/1989
SHDR-TWR1	Shredder Cooling Tower	8248, PSDTX708M6
TWR-A-1	Cooling Tower A-1	8248, PSDTX708M6
TWR-B	Cooling Tower B - EAF & LMS	8248, PSDTX708M6

### **New Source Review Authorization References by Emissions Unit**

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

<b>Unit/Group/Process ID No.</b>	<b>Emission Unit Name/Description</b>	<b>New Source Review Authorization</b>
TWR-C-1	Cooling Tower C-1	8248, PSDTX708M6
USED OILLDG	Used Oil Loading to Tank Trucks	51/09/12/1989
Y1	6,000 Gallon Asphalt Emulsion Storage Tank	51/09/12/1989
Y2	10,000 Gallon Oily Water Glycol Storage Tank	106.478/09/04/2000

## **Appendix A**

<b>Acronym List .....</b>	<b>50</b>
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## Acronym List

The following abbreviations or acronyms may be used in this permit:

ACFM	.....	actual cubic feet per minute
AMOC	.....	alternate means of control
ARP	.....	Acid Rain Program
ASTM	.....	American Society of Testing and Materials
B/PA	.....	Beaumont/Port Arthur (nonattainment area)
CAM	.....	Compliance Assurance Monitoring
CD	.....	control device
COMS	.....	continuous opacity monitoring system
CVS	.....	closed-vent system
D/FW	.....	Dallas/Fort Worth (nonattainment area)
DR	.....	Designated Representative
ELP	.....	El Paso (nonattainment area)
EP	.....	emission point
EPA	.....	U.S. Environmental Protection Agency
EU	.....	emission unit
FCAA Amendments	.....	Federal Clean Air Act Amendments
FOP	.....	federal operating permit
GF	.....	grandfathered
gr/100 scf	.....	grains per 100 standard cubic feet
HAP	.....	hazardous air pollutant
H/G/B	.....	Houston/Galveston/Brazoria (nonattainment area)
H <sub>2</sub> S	.....	hydrogen sulfide
ID No.	.....	identification number
lb/hr	.....	pound(s) per hour
MMBtu/hr	.....	Million British thermal units per hour
MRRT	.....	monitoring, recordkeeping, reporting, and testing
NA	.....	nonattainment
N/A	.....	not applicable
NADB	.....	National Allowance Data Base
NO <sub>x</sub>	.....	nitrogen oxides
NSPS	.....	New Source Performance Standard (40 CFR Part 60)
NSR	.....	New Source Review
ORIS	.....	Office of Regulatory Information Systems
Pb	.....	lead
PBR	.....	Permit By Rule
PM	.....	particulate matter
ppmv	.....	parts per million by volume
PSD	.....	prevention of significant deterioration
RO	.....	Responsible Official
SO <sub>2</sub>	.....	sulfur dioxide
TCEQ	.....	Texas Commission on Environmental Quality
TSP	.....	total suspended particulate
TVP	.....	true vapor pressure
U.S.C.	.....	United States Code
VOC	.....	volatile organic compound

**Appendix B**

**Major NSR Summary Table ..... 52**

## Major NSR Summary Table

Permit Number: 8248 and PSDTX708M6			Issuance Date: July 24, 2014				
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY**	Spec. Cond.	Spec. Cond.	Spec. Cond.
FFURNBHSTK	Pulse-Jet Baghouse Stack - LMS DEC & Melt Shop Ventilation	CO	36.51	158.21	3, 27, 28, 42	3, 27, 28, 41, 42	
		VOC	14.39	62.37	3, 27, 28, 42	3, 27, 28, 41, 42	
		SO <sub>2</sub>	30.00	130.00	3, 27, 28, 42	3, 27, 28, 41, 42	3, 38, 40
		NO <sub>x</sub>	1.92	8.34	3, 27, 28, 42	3, 27, 28, 41, 42	
		PM	6.59	28.55	3, 4, 5, 7, 17, 18, 27, 28, 42	3, 4, 5, 7, 17, 18, 27, 28, 41, 42	4, 5
		PM <sub>10</sub>	5.80	25.12	3, 4, 5, 7, 17, 18, 27, 28, 42	3, 4, 5, 7, 17, 18, 27, 28, 41, 42	4, 5
		PM <sub>2.5</sub>	5.73	24.83	3, 4, 5, 7, 17, 18, 27, 28, 42	3, 4, 5, 7, 17, 18, 27, 28, 41, 42	4, 5
		Antimony	< 0.01	< 0.01	3, 5, 7, 27, 28, 42	3, 5, 7, 27, 28, 41, 42	5
		Arsenic	< 0.01	< 0.01	3, 5, 7, 27, 28, 42	3, 5, 7, 27, 28, 41, 42	5
		Barium	0.02	0.10	3, 7, 27, 28, 42	3, 7, 27, 28, 41, 42	
		Benzene	0.44	1.89	3, 27, 28	3, 27, 28, 41	
		Beryllium	< 0.01	< 0.01	3, 5, 7, 27, 28, 42	3, 5, 7, 27, 28, 41, 42	5
		Cadmium	< 0.01	< 0.01	3, 5, 7, 27, 28, 42	3, 5, 7, 27, 28, 41, 42	5
		Chromium	0.01	0.04	3, 5, 7, 27, 28, 42	3, 5, 7, 27, 28, 41, 42	5
		Copper	< 0.01	0.02	3, 7, 27, 28, 42	3, 7, 27, 28, 41, 42	
		Iron	0.54	2.34	3, 7, 27, 28, 42	3, 7, 27, 28, 41, 42	
		Lead	0.03	0.14	3, 5, 7, 27, 28, 42	3, 5, 7, 27, 28, 41, 42	5
		Manganese	0.02	0.07	3, 5, 7, 27, 28, 42	3, 5, 7, 27, 28, 41, 42	5
		Mercury	< 0.01	0.01	3, 5, 7, 27, 28, 42	3, 5, 7, 27, 28, 41, 42	5
		Nickel	0.02	0.10	3, 5, 7, 27, 28, 42	3, 5, 7, 27, 28, 41, 42	5
		Selenium	< 0.01	< 0.01	3, 5, 7, 27, 28, 42	3, 5, 7, 27, 28, 41, 42	5
		Silica	0.01	0.03	3, 7, 27, 28, 42	3, 7, 27, 28, 41, 42	
		Silver	< 0.01	< 0.01	3, 7, 27, 28, 42	3, 7, 27, 28, 41, 42	
		Thallium	< 0.01	< 0.01	3, 7, 27, 28, 42	3, 7, 27, 28, 41, 42	
		Vanadium	< 0.01	< 0.01	3, 7, 27, 28, 42	3, 7, 27, 28, 41, 42	
		Zinc	0.11	0.46	3, 7, 27, 28, 42	3, 7, 27, 28, 41, 42	
RABAGHOUSE	Reverse Air Baghouse	CO	162.58	704.50	3, 27, 28, 42	3, 27, 28, 41, 42	

Permit Number: 8248 and PSDTX708M6					Issuance Date: July 24, 2014		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY**	Spec. Cond.	Spec. Cond.	Spec. Cond.
	Monitor Vent – EAF DEC and Meltshop Ventilation	VOC	19.34	83.82	3, 27, 28, 42	3, 27, 28, 41, 42	
		SO <sub>2</sub>	30.00	130.00	3, 27, 28, 42	3, 27, 28, 41, 42	3, 38, 40
		NO <sub>x</sub>	30.47	132.04	3, 27, 28, 42	3, 27, 28, 41, 42	
		PM	14.58	63.19	3, 4, 5, 7, 17, 18, 27, 28, 42	3, 4, 5, 7, 17, 18, 27, 28, 41, 42	4, 5
		PM <sub>10</sub>	12.83	55.61	3, 4, 5, 7, 17, 18, 27, 28, 42	3, 4, 5, 7, 17, 18, 27, 28, 41, 42	4, 5
		PM <sub>2.5</sub>	12.69	54.97	3, 4, 5, 7, 17, 18, 27, 28, 42	3, 4, 5, 7, 17, 18, 27, 28, 41, 42	4, 5
		Antimony	< 0.01	< 0.01	3, 5, 7, 27, 28, 42	3, 5, 7, 27, 28, 41, 42	5
		Arsenic	< 0.01	< 0.01	3, 5, 7, 27, 28, 42	3, 5, 7, 27, 28, 41, 42	5
		Barium	0.08	0.33	3, 7, 27, 28, 42	3, 7, 27, 28, 41, 42	
		Benzene	0.58	2.53	3, 27, 28	3, 27, 28, 41	
		Beryllium	< 0.01	< 0.01	3, 5, 7, 27, 28, 42	3, 5, 7, 27, 28, 41, 42	5
		Cadmium	< 0.01	0.01	3, 5, 7, 27, 28, 42	3, 5, 7, 27, 28, 41, 42	5
		Chromium	0.01	0.06	3, 5, 7, 27, 28, 42	3, 5, 7, 27, 28, 41, 42	5
		Copper	0.01	0.06	3, 7, 27, 28, 42	3, 7, 27, 28, 41, 42	
		Iron	1.19	5.18	3, 7, 27, 28, 42	3, 7, 27, 28, 41, 42	
		Lead	0.12	0.51	3, 5, 7, 27, 28, 42	3, 5, 7, 27, 28, 41, 42	5
		Manganese	0.12	0.50	3, 5, 7, 27, 28, 42	3, 5, 7, 27, 28, 41, 42	5
		Mercury	0.03	0.15	3, 5, 7, 27, 28, 42	3, 5, 7, 27, 28, 41, 42	5
		Nickel	0.02	0.07	3, 5, 7, 27, 28, 42	3, 5, 7, 27, 28, 41, 42	5
		Selenium	< 0.01	< 0.01	3, 5, 7, 27, 28, 42	3, 5, 7, 27, 28, 41, 42	5
		Silica	0.01	0.06	3, 7, 27, 28, 42	3, 7, 27, 28, 41, 42	
		Silver	< 0.01	< 0.01	3, 7, 27, 28, 42	3, 7, 27, 28, 41, 42	
		Thallium	< 0.01	< 0.01	3, 7, 27, 28, 42	3, 7, 27, 28, 41, 42	
		Vanadium	< 0.01	< 0.01	3, 7, 27, 28, 42	3, 7, 27, 28, 41, 42	
		Zinc	0.61	2.66	3, 7, 27, 28, 42	3, 7, 27, 28, 41, 42	
LPHBURN-W	West Ladle Preheater Burner Vent	CO	0.80	3.46	3, 42	3, 42	
		NO <sub>x</sub>	0.95	4.12	3, 42	3, 42	
		PM	0.07	0.31	3, 42	3, 42	
		PM <sub>10</sub>	0.07	0.31	3, 42	3, 42	
		PM <sub>2.5</sub>	0.07	0.31	3, 42	3, 42	
		SO <sub>2</sub>	< 0.01	0.02	3, 42	3, 42	

Permit Number: 8248 and PSDTX708M6			Issuance Date: July 24, 2014				
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY**	Spec. Cond.	Spec. Cond.	Spec. Cond.
		VOC	0.05	0.23	3, 42	3, 42	
LPHBURN-E	East Ladle Preheater Burner Vent	CO	0.80	3.46	3, 42	3, 42	
		NO <sub>x</sub>	0.95	4.12	3, 42	3, 42	
		PM	0.07	0.31	3, 42	3, 42	
		PM <sub>10</sub>	0.07	0.31	3, 42	3, 42	
		PM <sub>2.5</sub>	0.07	0.31	3, 42	3, 42	
		SO <sub>2</sub>	< 0.01	0.02	3, 42	3, 42	
		VOC	0.05	0.23	3, 42	3, 42	
SPRAYSTK	Caster Spray Chamber Stack	CO	0.43	1.84	3, 42	3, 42	
		NO <sub>x</sub>	0.01	0.05	3, 42	3, 42	
		PM	0.28	1.21	3, 42	3, 42	
		PM <sub>10</sub>	0.28	1.21	3, 42	3, 42	
		PM <sub>2.5</sub>	0.28	1.21	3, 42	3, 42	
		SO <sub>2</sub>	< 0.01	0.03	3, 42	3, 42	
		VOC	0.28	1.20	3, 42	3, 42	
CASTER-MNTOR	Caster Roof Monitor Vent	CO	4.87	20.05	3, 42	3, 42	
		NO <sub>x</sub>	1.15	4.98	3, 42	3, 42	
		PM	3.83	16.61	3, 42	3, 42	
		PM <sub>10</sub>	3.83	16.61	3, 42	3, 42	
		PM <sub>2.5</sub>	3.83	16.61	3, 42	3, 42	
		SO <sub>2</sub>	0.69	2.98	3, 42	3, 42	
		VOC	2.87	11.36	3, 42	3, 42	
CASTRUNOUT	Caster Run-out Building Openings	CO	0.18	0.80	3, 42	3, 42	
		NO <sub>x</sub>	0.22	0.95	3, 42	3, 42	
		PM	0.08	0.32	3, 42	3, 42	
		PM <sub>10</sub>	0.07	0.32	3, 42	3, 42	
		PM <sub>2.5</sub>	0.07	0.31	3, 42	3, 42	
		SO <sub>2</sub>	< 0.01	< 0.01	3, 42	3, 42	
		VOC	0.01	0.05	3, 42	3, 42	
BUCKETS	Charge Buckets Outside Melt Shop Building (6)	PM	0.05	0.17	9, 42	9, 42	
		PM <sub>10</sub>	0.02	0.08	9, 42	9, 41, 42	
		PM <sub>2.5</sub>	< 0.01	0.01	9, 42	9, 41, 42	



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Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY**	Spec. Cond.	Spec. Cond.	Spec. Cond.
MELT-FUG	Melt Shop Building Melting Room Fugitives - TOTAL	PM	4.09	17.72	3, 4, 5, 8, 9, 42	4, 5, 8, 9, 41, 42	4, 5
		PM <sub>10</sub>	2.37	10.28	3, 4, 5, 8, 9, 42	4, 5, 8, 9, 41, 42	4, 5
		PM <sub>2.5</sub>	1.76	7.62	3, 4, 5, 8, 9, 42	4, 5, 8, 9, 41, 42	4, 5
		CO	1.53	6.65	3, 42	3, 41, 42	
		VOC	0.03	0.10	3, 42	3, 41, 42	
		SO <sub>2</sub>	0.16	0.71	3, 42	3, 41, 42	
		NO <sub>x</sub>	0.23	0.84	3, 42	3, 41, 42	
		Antimony	< 0.01	< 0.01	3, 5, 8, 9, 42	3, 5, 8, 9, 41, 42	5
		Arsenic	< 0.01	< 0.01	3, 5, 8, 9, 42	3, 5, 8, 9, 41, 42	5
		Barium	< 0.01	0.02	3, 8, 9, 42	3, 8, 9, 41, 42	
		Benzene	< 0.01	< 0.01	3, 42	3, 41, 42	
		Beryllium	< 0.01	< 0.01	3, 5, 8, 9, 42	3, 5, 8, 9, 41, 42	5
		Cadmium	< 0.01	< 0.01	3, 5, 8, 9, 42	3, 5, 8, 9, 41, 42	5
		Chromium	< 0.01	0.01	3, 5, 8, 9, 42	3, 5, 8, 9, 41, 42	5
		Copper	< 0.01	0.02	3, 8, 9, 42	3, 8, 9, 41, 42	
		Iron	0.34	1.45	3, 8, 9, 42	3, 8, 9, 41, 42	
		Lead	0.01	0.02	3, 5, 8, 9, 42	3, 5, 8, 9, 41, 42	5
		Manganese	0.02	0.10	3, 5, 8, 9, 42	3, 5, 8, 9, 41, 42	5
		Mercury	< 0.01	< 0.01	3, 5, 8, 9, 42	3, 5, 8, 9, 41, 42	5
		Nickel	< 0.01	< 0.01	3, 5, 8, 9, 42	3, 5, 8, 9, 41, 42	5
		Selenium	< 0.01	< 0.01	3, 5, 8, 9, 42	3, 5, 8, 9, 41, 42	5
		Silica	< 0.01	< 0.01	3, 8, 9, 42	3, 8, 9, 41, 42	
		Silver	< 0.01	< 0.01	3, 8, 9, 42	3, 8, 9, 41, 42	
		Thallium	< 0.01	< 0.01	3, 8, 9, 42	3, 8, 9, 41, 42	
		Vanadium	< 0.01	< 0.01	3, 8, 9, 42	3, 8, 9, 41, 42	
		Zinc	0.05	0.21	3, 8, 9, 42	3, 8, 9, 41, 42	
REHEATSTK	Reheat Furnace Stack	PM	1.71	5.08	3, 6, 27, 42	3, 6, 27, 41, 42	
		PM <sub>10</sub>	1.71	5.08	3, 6, 27, 42	3, 6, 27, 41, 42	
		PM <sub>2.5</sub>	1.47	4.38	3, 6, 27, 42	3, 6, 27, 41, 42	
		CO	15.75	46.79	3, 27, 30, 37, 42	3, 27, 30, 37, 41, 42	38, 40
		NO <sub>x</sub>	17.25	48.80	3, 27, 30, 37, 42	3, 27, 30, 37, 41, 42	38, 40
		SO <sub>2</sub>	0.14	0.40	3	3	

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			lb/hr	TPY**	Spec. Cond.	Spec. Cond.	Spec. Cond.
		VOC	1.24	3.68	3, 42	3, 41, 42	
SCRAP-UNLD	Scrap – EAF Feedstock Storage Piles in Scrap Yard – Truck/Railcar Unloading (6)	PM	< 0.01	0.01	9, 42	9, 41, 42	
		PM <sub>10</sub>	< 0.01	< 0.01	9, 42	9, 41, 42	
		PM <sub>2.5</sub>	< 0.01	< 0.01	9, 42	9, 41, 42	
SCRAP WIND 1	Scrap – EAF Feedstock Storage Piles in Scrap Yard – Wind Erosion (6)	PM	-.--	0.01	9, 42	9, 41, 42	
		PM <sub>10</sub>	-.--	< 0.01	9, 42	9, 41, 42	
		PM <sub>2.5</sub>	-.--	< 0.01	9, 42	9, 41, 42	
SCRAP WIND 2	Scrap – Torch Cutting Storage Piles East of Melt Shop Bldg. – Wind Erosion (6)	PM	-.--	< 0.01	9, 42	9, 41, 42	
		PM <sub>10</sub>	-.--	< 0.01	9, 42	9, 41, 42	
		PM <sub>2.5</sub>	-.--	< 0.01	9, 42	9, 41, 42	
SCRAP WIND 3	Scrap – Torch Cutting Storage Piles Southeast of Melt Shop Bldg. – Wind Erosion (6)	PM	-.--	< 0.01	9, 42	9, 41, 42	
		PM <sub>10</sub>	-.--	< 0.01	9, 42	9, 41, 42	
		PM <sub>2.5</sub>	-.--	< 0.01	9, 42	9, 41, 42	
SCRAP-CUT1	Scrap – Torch Cutting and Truck Unloading to/from Torch Cutting Piles East of Melt Shop Bldg. (6)	CO	0.03	0.02	3, 42	3, 41, 42	
		VOC	< 0.01	< 0.01	3, 42	3, 41, 42	
		SO <sub>2</sub>	< 0.01	< 0.01	3, 42	3, 41, 42	
		NO <sub>x</sub>	0.06	0.04	3, 42	3, 41, 42	
		PM	0.38	0.26	3, 9, 42	3, 9, 41, 42	
		PM <sub>10</sub>	0.38	0.26	3, 9, 42	3, 9, 41, 42	
		PM <sub>2.5</sub>	0.38	0.26	3, 9, 42	3, 9, 41, 42	
SCRAP-CUT2	Scrap – Torch Cutting and Truck Unloading to/from Torch Cutting Piles Southeast of Melt Shop Bldg. (6)	CO	0.03	0.01	3, 42	3, 41, 42	
		VOC	< 0.01	< 0.01	3, 42	3, 41, 42	
		SO <sub>2</sub>	< 0.01	< 0.01	3, 42	3, 41, 42	
		NO <sub>x</sub>	0.06	0.02	3, 42	3, 41, 42	
		PM	0.38	0.14	3, 9, 42	3, 9, 41, 42	
		PM <sub>10</sub>	0.38	0.14	3, 9, 42	3, 9, 41, 42	
		PM <sub>2.5</sub>	0.38	0.14	3, 9, 42	3, 9, 41, 42	
SCRAP-RAIL	Scrap – Crane Transfer to Railcars for Transfer to Melt Shop (6)	PM	< 0.01	0.01	9, 42	9, 41, 42	
		PM <sub>10</sub>	< 0.01	< 0.01	9, 42	9, 41, 42	
		PM <sub>2.5</sub>	< 0.01	< 0.01	9, 42	9, 41, 42	
DOLLIMUNLD	Magnesite and Dolomitic Lime –	PM	0.20	0.09	42	42	
		PM <sub>10</sub>	0.10	0.04	42	42	

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			lb/hr	TPY**	Spec. Cond.	Spec. Cond.	Spec. Cond.
	Storage Silo Unloading Hopper (6)	PM <sub>2.5</sub>	0.01	< 0.01	42	42	
MAGNSILOBH	Magnesite - Storage Silo Filter Vent	PM	0.09	0.05	24, 42	42	
		PM <sub>10</sub>	0.09	0.05	24, 42	42	
		PM <sub>2.5</sub>	0.09	0.05	24, 42	42	
KO61SILOBH	EAF Dust - Storage Silo Filter Vent	PM	0.19	0.82	24, 42	42	
		PM <sub>10</sub>	0.19	0.82	24, 42	42	
		PM <sub>2.5</sub>	0.19	0.82	24, 42	42	
DOLLIMSILO	Dolomitic Lime - Storage Silo Filter Vent	PM	0.26	0.09	24, 42	42	
		PM <sub>10</sub>	0.26	0.09	24, 42	42	
		PM <sub>2.5</sub>	0.26	0.09	24, 42	42	
REFRC-WIND	Spent Refractory Storage Piles East of the Melt Shop Building	PM	-.--	0.02	42	42	
		PM <sub>10</sub>	-.--	0.01	42	42	
		PM <sub>2.5</sub>	-.--	< 0.01	42	42	
DOLLIMCONV	Dolomitic Lime - Transfer Point Filter Vent at Silo Load-out Belt Conveyor	PM	0.07	0.03	42	42	
		PM <sub>10</sub>	0.07	0.03	42	42	
		PM <sub>2.5</sub>	0.07	0.03	42	42	
MAGNE-UNLD	Magnesite - Unloading to the Storage Pile East of Melt Shop (6)	PM	0.17	0.05	42	42	
		PM <sub>10</sub>	0.08	0.02	42	42	
		PM <sub>2.5</sub>	0.01	< 0.01	42	42	
MAGNE-WIND	Magnesite – Storage Piles – Wind Erosion (6)	PM	-.--	0.03	42	42	
		PM <sub>10</sub>	-.--	0.01	42	42	
		PM <sub>2.5</sub>	-.--	< 0.01	42	42	
MAGNE-CONV	Magnesite – Transfer Point at Silo Loadout Belt Conveyor (6)	PM	< 0.01	0.01	42	42	
		PM <sub>10</sub>	< 0.01	< 0.01	42	42	
		PM <sub>2.5</sub>	< 0.01	< 0.01	42	42	
ALLOYUNLD1	Alloy Aggregate - Storage Piles North of Melt Shop - Truck Unloading (6)	PM	< 0.01	< 0.01	9, 42	9, 41, 42	
		PM <sub>10</sub>	< 0.01	< 0.01	9, 42	9, 41, 42	
		PM <sub>2.5</sub>	< 0.01	< 0.01	9, 42	9, 41, 42	
ALLOYUNLD2	Alloy Aggregate - Storage Piles East of Melt Shop - Truck Unloading (6)	PM	< 0.01	< 0.01	9, 42	9, 41, 42	
		PM <sub>10</sub>	< 0.01	< 0.01	9, 42	9, 41, 42	
		PM <sub>2.5</sub>	< 0.01	< 0.01	9, 42	9, 41, 42	

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			lb/hr	TPY**	Spec. Cond.	Spec. Cond.	Spec. Cond.
ALLOYWIND1	Alloy Aggregate - Storage Piles North of Melt Shop - Wind Erosion (6)	PM	-.--	< 0.01	9, 42	9, 41, 42	
		PM <sub>10</sub>	-.--	< 0.01	9, 42	9, 41, 42	
		PM <sub>2.5</sub>	-.--	< 0.01	9, 42	9, 41, 42	
ALLOYWIND2	Alloy Aggregate - Storage Piles East of Melt Shop - Wind Erosion (6)	PM	-.--	0.01	9, 42	9, 41, 42	
		PM <sub>10</sub>	-.--	< 0.01	9, 42	9, 41, 42	
		PM <sub>2.5</sub>	-.--	< 0.01	9, 42	9, 41, 42	
SLAG FUG	Slag Drop from Furnace to Slag Tunnel; Slag Front-End Loader Transfers to Quenching Enclosure (6)	PM	0.45	1.80	9, 42	9, 41, 42	
		PM <sub>10</sub>	0.21	0.85	9, 42	9, 41, 42	
		PM <sub>2.5</sub>	0.03	0.13	9, 42	9, 41, 42	
FESLAGUNLD	Ferrous Slag - Unloading to Storage Piles Near the Melt Shop Building (6)	PM	< 0.01	< 0.01	9, 42	9, 41, 42	
		PM <sub>10</sub>	< 0.01	< 0.01	9, 42	9, 41, 42	
		PM <sub>2.5</sub>	< 0.01	< 0.01	9, 42	9, 41, 42	
FESLAGWIND	Ferrous Slag - Wind Erosion of Reclaim Storage Piles Near the Melt Shop Bldg. (6)	PM	-.--	0.04	9, 42	9, 41, 42	
		PM <sub>10</sub>	-.--	0.02	9, 42	9, 41, 42	
		PM <sub>2.5</sub>	-.--	< 0.01	9, 42	9, 41, 42	
REFRC-FUG	Spent Refractory/Other Waste Material - Unloading to Storage Piles and Loading to Trucks (6)	PM	< 0.01	< 0.01	42	42	
		PM <sub>10</sub>	< 0.01	< 0.01	42	42	
		PM <sub>2.5</sub>	< 0.01	< 0.01	42	42	
SWEEP-FUG1	Trailer/Railcar Sweepings - Trailer/Railcar Clean-out, and Loading to Trucks near OMS Slag Processing Area (6)	PM	0.09	0.02	9, 42	9, 41, 42	
		PM <sub>10</sub>	0.04	< 0.01	9, 42	9, 41, 42	
		PM <sub>2.5</sub>	< 0.01	< 0.01	9, 42	9, 41, 42	
SWEEP-FUG2	Trailer/Railcar Cleanout, Loading of Storage Piles, Screening, and Loading of Trucks - East of Reverse Air Baghouse (6)	PM	0.42	0.05	9, 42	9, 41, 42	
		PM <sub>10</sub>	0.20	0.03	9, 42	9, 41, 42	
		PM <sub>2.5</sub>	0.03	< 0.01	9, 42	9, 41, 42	
SWEEP-WIND1	Trailer/Railcar Sweepings - Wind	PM	-.--	0.08	9, 42	9, 41, 42	
		PM <sub>10</sub>	-.--	0.04	9, 42	9, 41, 42	

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			lb/hr	TPY**	Spec. Cond.	Spec. Cond.	Spec. Cond.
	Erosion of Storage Piles Near OMS Slag Processing Area (6)	PM <sub>2.5</sub>	-.--	< 0.01	9, 42	9, 41, 42	
SWEEP-WIND2	Trailer/Railcar Sweepings – Wind Erosion of Storage Piles East of Reverse Air Baghouse (6)	PM	-.--	0.39	9, 42	9, 41, 42	
		PM <sub>10</sub>	-.--	0.20	9, 42	9, 41, 42	
		PM <sub>2.5</sub>	-.--	0.03	9, 42	9, 41, 42	
KO61-FUG	EAF Dust – Railcar Loading Enclosure Openings (6)	PM	0.53	0.07	4, 5, 9, 42	4, 5, 9, 41, 42	4, 5
		PM <sub>10</sub>	0.25	0.03	4, 5, 9, 42	4, 5, 9, 41, 42	4, 5
		PM <sub>2.5</sub>	0.04	< 0.01	4, 5, 9, 42	4, 5, 9, 41, 42	4, 5
SHDR-STK	Shredder - Z-Box Separator Fabric Filter Stack	VOC	0.18	0.31	43	43, 49	
		PM	0.34	1.49	43, 44	43, 49	
		PM <sub>10</sub>	0.34	1.49	43, 44	43, 49	
		PM <sub>2.5</sub>	0.34	1.49	43, 44	43, 49	
		Lead	< 0.01	< 0.01	43, 44	43, 49	
		Benzene	0.16	0.23	43, 44	43, 49	
		Cadmium	< 0.01	< 0.01	43, 44	43, 49	
		Chromium	< 0.01	< 0.01	43, 44	43, 49	
		Mercury	< 0.01	< 0.01	43, 44	43, 49	
		Zinc	0.01	0.04	43, 44	43, 49	
SHDR-FUGS	Shredder - Hammermill, Shredder Materials Handling, & Storage Fugitives (6)	VOC	0.02	0.04	43, 44	43, 49	
		PM	0.61	0.76	43, 44	43, 49	
		PM <sub>10</sub>	0.29	0.36	43, 44	43, 49	
		PM <sub>2.5</sub>	0.04	0.05	43, 44	43, 49	
		Lead	< 0.01	< 0.01	43, 44	43, 49	
		Benzene	< 0.01	< 0.01	43, 44	43, 49	
		Cadmium	< 0.01	< 0.01	43, 44	43, 49	
		Chromium	< 0.01	< 0.01	43, 44	43, 49	
		Mercury	< 0.01	< 0.01	43, 44	43, 49	
		Zinc	0.01	0.02	43, 44	43, 49	
JAW1	Slag Crusher - Transfer to Feeder (6)	PM	0.03	0.02	42	11, 42	
		PM <sub>10</sub>	0.01	< 0.01	42	11, 42	
		PM <sub>2.5</sub>	< 0.01	< 0.01	42	11, 42	

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			lb/hr	TPY**	Spec. Cond.	Spec. Cond.	Spec. Cond.
JAW4	Slag Crusher - Jaw Crusher (6)	PM	0.01	< 0.01	42	11, 42	
		PM <sub>10</sub>	< 0.01	< 0.01	42	11, 42	
		PM <sub>2.5</sub>	< 0.01	< 0.01	42	11, 42	
JAW5	Slag Crusher - Discharge from Jaw Crusher (6)	PM	0.03	< 0.01	42	11, 42	
		PM <sub>10</sub>	0.01	< 0.01	42	11, 42	
		PM <sub>2.5</sub>	< 0.01	< 0.01	42	11, 42	
TWR-B	Cooling Tower B - EAF / LMS (6)	PM	0.59	2.48	42	42	
		PM <sub>10</sub>	0.40	1.74	42	42	
		PM <sub>2.5</sub>	< 0.01	< 0.01	42	42	
TWR-A-1	Cooling Tower A-1 (6)	PM	0.37	1.56	42	42	
		PM <sub>10</sub>	0.25	1.10	42	42	
		PM <sub>2.5</sub>	< 0.01	< 0.01	42	42	
TWR-C-1	Cooling Tower C-1 (6)	PM	0.41	1.74	42	42	
		PM <sub>10</sub>	0.28	1.21	42	42	
		PM <sub>2.5</sub>	< 0.01	< 0.01	42	42	
CASTER-TWR	Caster Spray Cooling Tower (6)	PM	0.13	0.54	42	42	
		PM <sub>10</sub>	0.09	0.39	42	42	
		PM <sub>2.5</sub>	< 0.01	< 0.01	42	42	
CASTER-TWR1	Caster Spray Side Stream Cooling Tower (6)	PM	0.09	0.36	42	42	
		PM <sub>10</sub>	0.06	0.26	42	42	
		PM <sub>2.5</sub>	< 0.01	< 0.01	42	42	
MILL-TWR-1	Rolling Mill Cooling Tower (6)	PM	0.35	1.47	42	42	
		PM <sub>10</sub>	0.24	1.04	42	42	
		PM <sub>2.5</sub>	< 0.01	< 0.01	42	42	
MILL-TWR-2	Rolling Mill Contact Water System Cooling Tower (6)	PM	0.15	0.61	42	42	
		PM <sub>10</sub>	0.10	0.44	42	42	
		PM <sub>2.5</sub>	< 0.01	< 0.01	42	42	
COOLBEDTWR	Rolling Mill Cooling Bed Cooling Tower (6)	PM	0.04	0.19	42	42	
		PM <sub>10</sub>	0.03	0.13	42	42	
		PM <sub>2.5</sub>	< 0.01	< 0.01	42	42	
SHDR-TWR1	Shredder Cooling Tower (6)	PM	0.03	0.12			
		PM <sub>10</sub>	0.02	0.09			

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			lb/hr	TPY**	Spec. Cond.	Spec. Cond.	Spec. Cond.
		PM <sub>2.5</sub>	< 0.01	< 0.01			
OMS-SLAG	OMS Slag Handling and Processing Near East End of Property (6)	PM	0.68	0.70	42	42	
		PM <sub>10</sub>	0.32	0.33	42	42	
		PM <sub>2.5</sub>	0.05	0.05	42	42	
ENGN-IS	300-hp IS UPS, Emergency Generator Engine	PM	0.66	0.03	3, 42	42	
		PM <sub>10</sub>	0.66	0.03	3, 42	42	
		PM <sub>2.5</sub>	0.66	0.03	3, 42	42	
		CO	2.00	0.10	3, 42	42	
		VOC	0.74	0.04	3, 42	42	
		SO <sub>2</sub>	< 0.01	< 0.01	3, 42	42	
		NO <sub>x</sub>	9.30	0.47	3, 42	42	
ENGN-CASTR	1,600-hp Caster/LMS, Emergency Generator Engine	PM	1.12	0.06	3, 42	42	
		PM <sub>10</sub>	1.12	0.06	3, 42	42	
		PM <sub>2.5</sub>	1.12	0.06	3, 42	42	
		CO	8.80	0.44	3, 42	42	
		VOC	1.13	0.06	3, 42	42	
		SO <sub>2</sub>	0.02	< 0.01	3, 42	42	
		NO <sub>x</sub>	38.40	1.92	3, 42	42	
ENGN-WATER	120-hp Water Emergency Stand-by Engine	PM	0.26	0.01	3, 42	42	
		PM <sub>10</sub>	0.26	0.01	3, 42	42	
		PM <sub>2.5</sub>	0.26	0.01	3, 42	42	
		CO	0.80	0.04	3, 42	42	
		VOC	0.30	0.01	3, 42	42	
		SO <sub>2</sub>	< 0.01	< 0.01	3, 42	42	
		NO <sub>x</sub>	3.72	0.19	3, 42	42	
BLASTMAINT	Sand Blast Cleaning for Equipment Maintenance (6)	PM	0.30	0.06	42	42	
		PM <sub>10</sub>	0.07	0.01	42	42	
		PM <sub>2.5</sub>	0.07	0.01	42	42	
		Silica	0.30	0.06	42	42	
PAINTSTACK	Vehicle Maintenance Paint Shop Stack	PM	0.03	0.06	42	42	
		PM <sub>10</sub>	0.03	0.06	42	42	
		PM <sub>2.5</sub>	0.03	0.06	42	42	

Permit Number: 8248 and PSDTX708M6			Issuance Date: July 24, 2014				
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY**	Spec. Cond.	Spec. Cond.	Spec. Cond.
		VOC	6.00	13.00	42	42	
C-SILO300	Carbon Storage Silo 300 Filter Vent	PM	0.18	0.05	42	42	
		PM <sub>10</sub>	0.18	0.05	24, 42	42	
		PM <sub>2.5</sub>	0.18	0.05	24, 42	42	
C-SILO301	Carbon Storage Silo 301 Filter Vent	PM	0.18	0.05	24, 42	42	
		PM <sub>10</sub>	0.18	0.05	24, 42	42	
		PM <sub>2.5</sub>	0.18	0.05	24, 42	42	
C-HOPPER	Carbon Unloading Hopper Filter Vent	PM	0.14	0.08	42	42	
		PM <sub>10</sub>	0.14	0.08	42	42	
		PM <sub>2.5</sub>	0.14	0.08	42	42	

- (1) Emission point identification - either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources, use area name or fugitive source name.
- (3) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1  
NO<sub>x</sub> - total oxides of nitrogen  
SO<sub>2</sub> - sulfur dioxide  
PM - total particulate matter, suspended in the atmosphere, including PM<sub>10</sub> and PM<sub>2.5</sub>, as represented  
PM<sub>10</sub> - total particulate matter equal to or less than 10 microns in diameter, including PM<sub>2.5</sub>, as represented  
PM<sub>2.5</sub> - particulate matter equal to or less than 2.5 microns in diameter  
CO - carbon monoxide
- (4) Compliance with annual emission limits (tons per year) is based on a 12 month rolling period.
- (5) Planned startup and shutdown emissions are included. Maintenance activities are not authorized by this permit.
- (6) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.





TEXAS COMMISSION ON ENVIRONMENTAL QUALITY  
AIR QUALITY PERMIT



*A Permit Is Hereby Issued To*  
**Structural Metals, Inc.**  
*Authorizing the Construction and Operation of*  
**Steel Minimill Facility**  
*Located at* **Seguin, Guadalupe County, Texas**  
Latitude 29° 34' 34" Longitude 98° 1' 59"

Permits: 8248 and PSDTX708M6

Amendment Date : July 24, 2014

Renewal Date: July 14, 2016

For the Commission

1. **Facilities** covered by this permit shall be constructed and operated as specified in the application for the permit. All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. Variations from these representations shall be unlawful unless the permit holder first makes application to the Texas Commission on Environmental Quality (commission) Executive Director to amend this permit in that regard and such amendment is approved. [Title 30 Texas Administrative Code 116.116 (30 TAC 116.116)]
2. **Voiding of Permit.** A permit or permit amendment is automatically void if the holder fails to begin construction within 18 months of the date of issuance, discontinues construction for more than 18 months prior to completion, or fails to complete construction within a reasonable time. Upon request, the executive director may grant an 18-month extension. Before the extension is granted the permit may be subject to revision based on best available control technology, lowest achievable emission rate, and netting or offsets as applicable. One additional extension of up to 18 months may be granted if the permit holder demonstrates that emissions from the facility will comply with all rules and regulations of the commission, the intent of the Texas Clean Air Act (TCAA), including protection of the public's health and physical property; and (b)(1) the permit holder is a party to litigation not of the permit holder's initiation regarding the issuance of the permit; or (b)(2) the permit holder has spent, or committed to spend, at least 10 percent of the estimated total cost of the project up to a maximum of \$5 million. A permit holder granted an extension under subsection (b)(1) of this section may receive one subsequent extension if the permit holder meets the conditions of subsection (b)(2) of this section. [30 TAC 116.120(a), (b) and (c)]
3. **Construction Progress.** Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office of the commission not later than 15 working days after occurrence of the event. [30 TAC 116.115(b)(2)(A)]
4. **Start-up Notification.** The appropriate air program regional office shall be notified prior to the commencement of operations of the facilities authorized by the permit in such a manner that a representative of the commission may be present. The permit holder shall provide a separate notification for the commencement of operations for each unit of phased construction, which may involve a series of units commencing operations at different times. Prior to operation of the facilities authorized by the permit, the permit holder shall identify the source or sources of allowances to be utilized for compliance with Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program). [30 TAC 116.115(b)(2)(B)(iii)]
5. **Sampling Requirements.** If sampling is required, the permit holder shall contact the commission's Office of Compliance and Enforcement prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission. The permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant. [30 TAC 116.115(b)(2)(C)]

6. **Equivalency of Methods.** The permit holder must demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the permit. Alternative methods shall be applied for in writing and must be reviewed and approved by the executive director prior to their use in fulfilling any requirements of the permit. [30 TAC 116.115(b)(2)(D)]
7. **Recordkeeping.** The permit holder shall maintain a copy of the permit along with records containing the information and data sufficient to demonstrate compliance with the permit, including production records and operating hours; keep all required records in a file at the plant site. If, however, the facility normally operates unattended, records shall be maintained at the nearest staffed location within Texas specified in the application; make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction; comply with any additional recordkeeping requirements specified in special conditions attached to the permit; and retain information in the file for at least two years following the date that the information or data is obtained. [30 TAC 116.115(b)(2)(E)]
8. **Maximum Allowable Emission Rates.** The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on the table attached to the permit entitled "Emission Sources--Maximum Allowable Emission Rates." [30 TAC 116.115(b)(2)(F)]
9. **Maintenance of Emission Control.** The permitted facilities shall not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. The permit holder shall provide notification for upsets and maintenance in accordance with 30 TAC 101.201, 101.211, and 101.221 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements; and Operational Requirements). [30 TAC 116.115(b)(2)(G)]
10. **Compliance with Rules.** Acceptance of a permit by an applicant constitutes an acknowledgment and agreement that the permit holder will comply with all rules, regulations, and orders of the commission issued in conformity with the TCAA and the conditions precedent to the granting of the permit. If more than one state or federal rule or regulation or permit condition is applicable, the most stringent limit or condition shall govern and be the standard by which compliance shall be demonstrated. Acceptance includes consent to the entrance of commission employees and agents into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the permit. [30 TAC 116.115(b)(2)(H)]
11. **This** permit may not be transferred, assigned, or conveyed by the holder except as provided by rule. [30 TAC 116.110(e)]
12. **There** may be additional special conditions attached to a permit upon issuance or modification of the permit. Such conditions in a permit may be more restrictive than the requirements of Title 30 of the Texas Administrative Code. [30 TAC 116.115(c)]
13. **Emissions** from this facility must not cause or contribute to a condition of "air pollution" as defined in Texas Health and Safety Code (THSC) 382.003(3) or violate THSC 382.085. If the executive director determines that such a condition or violation occurs, the holder shall implement additional abatement measures as necessary to control or prevent the condition or violation.
14. **The** permit holder shall comply with all the requirements of this permit. Emissions that exceed the limits of this permit are not authorized and are violations of this permit.

## **Special Conditions**

Permit Number 8248 and PSDTX708M6

### **Emission Limitations**

1. This permit authorizes only those sources of emissions listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates," and those sources are limited to the emission rates and other conditions specified in the table. In addition, this permit authorizes all emissions from planned startup and shutdown activities associated with facilities or groups of facilities that are authorized by this permit. **(07/14)**

Prevention of Significant Deterioration is applicable to particulate matter (PM), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), volatile organic compounds (VOC), and to each special condition of this permit. **(01/04)**

### **Steel Mill Conditions**

#### **Fuel Specifications**

2. Fuel for the reheat furnace (Emission Point No. [EPN] REHEATSTK), ladle preheaters (EPNs LPHBURN-W and LPHBURN-E), resin dryers, tundish preheaters/dryers, and strand torch cutting shall be pipeline-quality natural gas. Fuel for torch cutting shall be propane, propylene, acetylene, or pipeline-quality natural gas. Use of any other fuel will require prior approval of the Executive Director of the Texas Commission on Environmental Quality (TCEQ). **(07/14)**
3. Upon request by the Executive Director of the TCEQ or the TCEQ Regional Director or any local air pollution control program having jurisdiction, the holder of this permit shall provide a sample and/or an analysis of the fuels used in these facilities or shall allow air pollution control program representatives to obtain a sample for analysis. **(07/14)**

#### **Federal Applicability**

4. These facilities shall comply with all applicable requirements of the U.S. Environmental Protection Agency (EPA) regulations on Standards of Performance for New Stationary Sources in Title 40 Code of Federal Regulations (40 CFR) Part 60, specifically the following:
  - A. Subpart A - General Provisions; and
  - B. Subpart AAa - Steel Plant Electric Arc Furnaces.
5. These facilities shall comply with all applicable requirements of the EPA Regulations on National Emission Standards for Hazardous Air Pollutants for Source Categories promulgated in 40 CFR Part 63, specifically the following: **(07/14)**
  - A. Subpart A - General Provisions;
  - B. Subpart ZZZZ - Stationary Reciprocating Internal Combustion Engines; and

C. Subpart YYYYYY - Electric Arc Furnace Steelmaking Facilities.

### **Opacity/Visible Emission Limitations**

6. Opacity of particulate matter emissions from the Reheat Furnace Stack (EPN REHEATSTK) shall not exceed 5%. Determination of compliance with this requirement shall be made by first observing for visible emissions during normal plant operations. Observations shall be made at least 15 feet and no more than 0.25 mile from the emission point. If visible emissions are observed from the emission point, the owner or operator shall: **(07/14)**
  - A. Assume the opacity limit is exceeded, take immediate action to eliminate visible emissions, record the corrective action within 24 hours, and comply with any applicable requirements in 30 Texas Administrative Code (TAC) § 101.201, Emissions Event Reporting and Record Keeping Requirements; or
  - B. Determine opacity using 40 CFR Part 60, Appendix A, Test Method 9. If the 5 percent opacity limit is exceeded, take immediate action to eliminate visible emissions, record the corrective action within 24 hours, and comply with applicable requirements in 30 TAC § 101.201, Emissions Event Reporting and Record Keeping Requirements.

Contributions from uncombined water vapor shall not be included in determining compliance with this condition. Determination of compliance with this requirement shall be performed and the results recorded quarterly.

7. Opacity of particulate matter emissions from the Reverse Air Baghouse Monitor Vent and Pulse Jet Baghouse Stack (EPNs RABAGHOUSE and FFURNBHSTK) shall not exceed 3%. Observations shall be conducted at least once per day for at least three 6-minute periods when the furnace is operating in the melting and refining period. Observations shall be conducted in accordance with Method 9. If visible emissions occur from more than one point, the opacity shall be recorded for any points where visible emissions are observed. Where it is possible to determine that a number of visible emission sites relate to only one incident of the visible emission, only one set of three 6-minute observations will be required. In that case, the Method 9 observations must be made for the site of highest opacity that directly relates to the cause (or location) of visible emissions observed during a single incident. Records shall be maintained of any 6-minute average that is in excess of 3% opacity. **(07/14)**
8. Opacity of particulate matter emissions from the melt shop shall not exceed 6%. Melt shop opacity observations shall be conducted at least once per day when the electric arc furnace is operating in the meltdown and refining period. Melt shop opacity shall be determined as the arithmetic average of a set of 24 consecutive 15-second opacity observations of emissions from the melt shop taken in accordance with TM 9. Melt shop opacity shall be recorded for any points where visible emissions are observed. Where it is possible to determine that a number of visible emission sites relate to only one incident of visible emissions, only one set of observations of the melt shop opacity will be required. In this

case, the melt shop opacity observations must be made for the site of the highest opacity that directly relates to the cause (or location) of visible emissions observed during a single incident. **(07/14)**

9. There shall be no visible fugitive emissions leaving the property from the melt shop vents, charge buckets, scrap loading/unloading alloy aggregate storage piles, in-plant roads, vehicle traffic, slag loading/unloading, slag quench building operations, slag crushing, scrap stockpiles or shredder operations, which include the shredder fluff handling. Observations for visible emissions shall be performed and recorded quarterly. The visible emissions determination shall be made during normal plant operations. Observations shall be made on the downwind property line for a minimum of six minutes. Within 24 hours of visible emissions being observed, an evaluation must be accomplished in accordance with the EPA 40 CFR Part 60, Appendix A, Test Method 22, using the criteria that visible emissions shall not exceed a cumulative 30 seconds in duration in any six-minute period. If visible emissions exceed the Test Method 22 criteria, immediate action shall be taken to eliminate the excessive visible emissions. The corrective action shall be documented within 24 business hours of completion. **(07/14)**
10. There shall be no visible emissions from any point along any bulk material pneumatic transfer systems, or from the railcar/truck pneumatic unloading. If visible emissions are observed, immediate action shall be taken to eliminate the visible emissions. **(07/14)**

#### **Operational Limitations, Work Practices, and Plant Design**

11. The production of molten steel shall not exceed 150 tons per hour (tph) and 1,300,000 tons per year (tpy). Slag crushing operations shall not exceed 150 tph and 241,441 tpy. The slag jaw crusher shall not exceed 50 tph and 24,084 tpy. **(07/14)**
12. The facilities shall be limited to a maximum operating schedule of 24 hours per day, 7 days per week, 52 weeks per year, and 8,667 hours per year. **(07/14)**
13. All permanent in-plant roads and areas subject to road vehicle traffic shall be paved with a cohesive hard surface and cleaned, as necessary, to maintain compliance with the Texas Commission on Environmental Quality (TCEQ) rules and regulations. Permanent in-plant roads are those delineated on Drawing No. Y-788-123 contained in SMI-Texas submittal to the TCEQ and dated October 13, 2003. The stockpile and front-end loader areas will be sprinkled with water and/or other dust suppressants to maintain compliance with all TCEQ rules and regulations.
14. All particulate material retrieved from any of the baghouses will be handled in a manner that will prevent the material from becoming airborne into the atmosphere.
15. Oil filters accepted by the holder of this permit shall be drained and crushed. There shall be no running or dripping oil from the crushed filters as received.

16. Crushed used oil filters shall be processed only in the first charge to the furnace. The total weight of oil filters charged to the furnace in a heat shall not exceed the average weight per heat of oil filters charged to the furnace during the previously performed testing. **(11/99)**
17. The width of the air gap in the fourth hole water-cooled duct of the electric arc furnace shall be operated to maintain flow into the gap during meltdown and refining. The holder of this permit shall monitor furnace emissions per 40 CFR Part 60, Subpart AAa.
18. The air flow rate in the ductwork exhausting to the Melt Shop EPNs RABAGHOUSE and FFURNBHSTK (Ventilation System Baghouses) shall be measured and recorded at least once every six months. Duct velocity measurements shall be taken in accordance with EPA TMs 1 and 2, as applicable, or their equivalent at a minimum of one duct location per baghouse. The holder of this permit may request the TCEQ Executive Director to approve alternate sampling techniques or other means to determine the air flow rate. If the measured flow rate to the baghouses (in standard cubic feet per minute) has decreased by greater than 10 percent of the average flow rate measured during the emissions testing specified in Special Condition No. 25, the holder of this permit shall immediately implement maintenance activities (e.g., cleaning ductwork, performing baghouse blower maintenance, etc.) necessary to ensure that the average flow rate measured during the emissions testing is restored.
19. The North Melt Shop (ladle preheater chimney) Roof Vent shall remain closed at all times. **(07/14)**
20. Emissions from the ladle preheaters (EPNs LPHBURN-W and LPHBURN-E) shall be vented directly to the atmosphere. **(07/14)**
21. A pulse-jet fabric filter baghouse and reverse air fabric filter baghouse shall control particulate matter emissions from the Electric Arc Furnace, Direct Evacuation Control System, Ladle Metallurgy Station, and Melt Shop. **(07/14)**
  - A. The pulse-jet fabric filter baghouse (EPN FFURNBHSTK) shall be designed to meet an outlet grain loading of not more than 0.0018 gr/dscf of exhaust.
  - B. The reverse air fabric filter baghouse (EPN RABAGHOUSE) shall be designed to meet an outlet grain loading of not more than 0.0028 gr/dscf exhaust.
22. All hooding, duct, and collection systems shall be effective in capturing emissions from the intended equipment and in preventing fugitive emissions from the building. The hooding and duct systems shall be maintained free of holes, cracks, and other conditions that would reduce the collection efficiency of the emission capture system. **(07/14)**
23. The bulk carbon storage silos (EPNs C-SILO300 and C-SILO301), the carbon receiving surge hopper (EPN C-HOPPER), the magnesite storage silo (EPN MAGNSILOBH), the lime storage silo and lime transfer (EPNs DOLLIMSILO and DOLLIMCONV), and the EAF dust storage silo (EPN KO61SILOBH) shall be equipped with a fabric filter designed to

meet an outlet grain loading of not more than 0.01 grains per dry standard cubic foot.  
**(07/14)**

24. A warning device shall be installed on all bulk storage silos to warn operators when the silos are full to prevent overloading. The silos shall not be overloaded at any time.  
**(07/14)**

### **Initial Determination of Compliance**

25. To demonstrate compliance with the MAERT and with emission performance levels as specified in the special conditions, the holder of this permit shall perform stack sampling and/or other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from the Pulse-Jet Baghouse Stack (EPN FFURNBHSTK) and the Reverse Air Baghouse Monitor Vent (EPN RABAGHOUSE). Air contaminants to be tested for include (but are not limited to) PM<sub>10</sub>, NO<sub>x</sub>, SO<sub>2</sub>, and CO. Sampling shall be accomplished within 120 days of achieving maximum production with petroleum coke used as the carbon source, but not later than 180 days after issuance of this permit/approval of this amendment. Sampling must be conducted in accordance with the TCEQ *Sampling Procedures Manual* and in accordance with the applicable EPA 40 CFR procedures. Any deviations from those procedures must be approved by the TCEQ Executive Director prior to sampling. **(07/14)**
26. To demonstrate compliance with the MAERT and with emission performance levels as specified in the special conditions, the holder of this permit shall perform stack sampling and/or other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from the Reheat Furnace Stack (EPN REHEATSTK). Air contaminants to be tested for include (but are not limited to) NO<sub>x</sub>, and CO. Sampling shall be accomplished within 60 days of operation of the new furnace, but not later than 18 months after approval of this amendment. Sampling must be conducted in accordance with the TCEQ *Sampling Procedures Manual* and in accordance with the applicable EPA 40 CFR procedures. Any deviations from those procedures must be approved by the TCEQ Executive Director prior to sampling. **(07/14)**

### **Demonstration of Continuous Compliance**

27. Upon request by the TCEQ Executive Director or the TCEQ Regional Director having jurisdiction, the holder of this permit shall perform stack sampling and/or other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere to demonstrate compliance with the MAERT and with emission performance levels as specified in the special conditions and/or otherwise prove satisfactory equipment performance. Sampling must be conducted in accordance with the TCEQ *Sampling Procedures Manual* and in accordance with the applicable EPA 40 CFR procedures. Any deviations from those procedures must be approved by the TCEQ Executive Director or the appropriate TCEQ Regional Director prior to conducting sampling. **(07/14)**

28. A bag leak detection system, as defined in the Standards of Performance for Steel Plants, 40 CFR Part 60, shall be installed, calibrated, maintained, and operated in both EPN RABAGHOUSE and EPN EFURNBHSTK. **(07/14)**
29. The North Melt Shop (ladle preheater chimney) Roof Vent shall be sampled at the request of the TCEQ Regional Director if TCEQ staff has documented visible emissions from the former EPN N-MS-MNTOR after September 30, 2007. **(05/07)**
30. The holder of this permit shall perform stack sampling and other testing as required to establish the actual quantities of air contaminants being emitted into the atmosphere from EPN REHEATSTK. Air contaminants from the Reheat Furnace to be sampled and analyzed include (but are not limited to) NO<sub>x</sub> and CO. Testing as required by this condition must be conducted in accordance with the Sampling Requirements conditions. Sampling shall be performed at least once every five years. **(07/14)**

### Sampling Requirements

31. The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at their own expense. Sampling ports and platforms shall be incorporated into the design of the stack(s) according to the specifications set forth in the attachment entitled "Chapter 2, Stack Sampling Facilities" prior to stack sampling. Alternate sampling facility designs may be submitted for approval by the TCEQ Regional Office with jurisdiction.
32. Sampling shall be conducted in accordance with the TCEQ *Sampling Procedures Manual* and EPA Test Methods in 40 CFR Part 60, Appendix A, and 40 CFR Part 51, Appendix M, as follows: **(07/14)**
  - A. Test Methods 1 through 4, as appropriate, for exhaust flow, diluent, and moisture concentration;
  - B. Test Methods 201A and 202 (or Test Method 5), modified with a controlled condensate method subject to approval from the TCEQ prior to sampling, for the concentration of PM<sub>10</sub> including back-half condensibles;
  - C. Test Method 6, 6a, 6c, or 8 for the concentration of SO<sub>2</sub>;
  - D. Test Method 7E, or equivalent methods, for the concentrations of NO<sub>x</sub> and O<sub>2</sub>; and
  - E. Test Method 10 for the concentration of CO.
33. A pretest meeting shall be held with personnel from the TCEQ before the required tests are performed. The TCEQ Regional Office with jurisdiction shall be notified not less than 45 days prior to sampling to schedule a pretest meeting. The notice shall include: **(07/14)**
  - A. Date for pretest meeting;
  - B. Date sampling will occur;



- C. Points or sources to be sampled;
- D. Name of firm conducting sampling;
- E. Type of sampling equipment to be used; and
- F. Method or procedure to be used in sampling.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test reports.

- 34. Alternate sampling methods and representative unit testing may be proposed by the permit holder. A written proposed description of any deviation from sampling procedures or emission sources specified in permit conditions or TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. Such a proposal must be approved by the TCEQ Regional Office with jurisdiction at least two weeks prior to sampling. **(07/14)**
- 35. Requests to waive testing for any pollutant specified shall be submitted, in writing, for approval to the TCEQ Office of Air, Air Permits Division in Austin. **(07/14)**
- 36. During stack sampling emission testing, the facilities shall operate at maximum represented production. Primary operating parameters that enable determination of production rates shall be monitored and recorded during the stack test. These parameters are to be determined at the pretest meeting. When sampling emissions from the EAF, cast steel production may be recorded as a surrogate for molten steel production provided that any steel that is recycled to the electric arc furnace is included in the recorded cast production rate. **(07/14)**

If the plant is unable to operate at the maximum represented production rates during testing, then additional stack testing shall be required when the production rate exceeds the previous stack test production rate by +10 percent unless otherwise determined, in writing, by the TCEQ Executive Director.

- 37. Requests for additional time to perform sampling shall be submitted to the TCEQ Regional Office with jurisdiction. Additional time to comply with the applicable federal requirements requires EPA approval, and requests shall be submitted to the TCEQ Regional Office with jurisdiction. **(07/14)**
- 38. Copies of the final sampling report shall be forwarded to the TCEQ within 60 days after sampling is completed. Sampling reports shall comply with the attached provisions of Chapter 14 of the TCEQ *Sampling Procedures Manual*. The reports shall be distributed as follows: **(07/14)**

One copy to the TCEQ Regional Office with jurisdiction.

One copy to the TCEQ Office of Air, Air Permits Division in Austin.

39. If, as a result of stack sampling, compliance with the permitted emission rates cannot be demonstrated, the holder of this permit shall adjust any operating parameters so as to comply with Special Condition No. 1 and the permitted emission rates.
40. If the holder of this permit is required to adjust any operating parameters for compliance, then beginning no later than 60 days after the date of the test conducted, the holder of this permit shall submit to the TCEQ, on a monthly basis, a record of adjusted operating parameters and daily records of production sufficient to demonstrate compliance with the permitted emission rates. Daily records of production and operating parameters shall be distributed as follows: **(07/14)**

One copy to the TCEQ Regional Office with jurisdiction.

One copy to the TCEQ Office of Air, Air Permits Division in Austin.

### **Recordkeeping Requirements**

41. In addition to the recordkeeping requirements specified in General Condition No. 7, 40 CFR Part 60, Subparts A and AAa, 40 CFR Part 63, Subparts A, ZZZZ, and YYYYY the following records shall be maintained at this facility site and made available at the request of personnel from the TCEQ or any other air pollution control program having jurisdiction to demonstrate compliance with permit limitations. These records shall be totaled for each calendar month, retained for a rolling 60-month period, and include the following:  
**(07/14)**
  - A. Observations for visible emissions and/or opacity determinations from the Reverse Air Baghouse Monitor Vent (EPN RABAGHOUSE), Pulse Jet Baghouse Stack (EPN FFURNBHSTK), the Melt Shop and the Reheat Furnace Stack (REHEATSTK);  
**(07/14)**
  - B. Quarterly observations for visible fugitive emissions leaving the property from melt shop vents, charge buckets, scrap loading/unloading, alloy aggregate storage piles, in-plant roads, vehicle traffic, slag loading/unloading, slag quench building operations, slag crushing, scrap stockpiles or shredder operations, which include the shredder fluff handling; **(07/14)**
  - C. Hourly steel production will be based on a calendar month production total averaged over the total operating hours of the furnace during that month. Cast steel production may be recorded as a surrogate for molten steel production, provided that any cast steel that is recycled to the electric arc furnace is included in the recorded cast production rate;
  - D. Total number of heats during each calendar month;
  - E. Annual production will be based on the sum of the previous 12 months of production;
  - F. All malfunctions, repairs, and maintenance of abatement systems, which includes bag replacement and the manufacturer's suggested cleaning and maintenance

schedule. Including the site-specific monitoring plan, and the manufacture's literature, relating to the installation, calibration maintenance and operation of the bag leak detection system. **(07/14)**

- G. Copies of previously required stack sampling, performance testing, or other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere. **(07/14)**
42. All monitoring data and support information as specified in 30 TAC § 122.144 shall be maintained at this facility site and made available at the request of personnel from the TCEQ or any other air pollution control program having jurisdiction. These records shall be retained for a rolling 60-month period. **(07/14)**

### **Shredder Conditions**

#### **Opacity/Visible Emission Limitations**

43. Opacity of particulate matter emissions from the Shredder Z-Box Separator Fabric Filter Stack (EPN SHDR-STK) shall not exceed 5 percent. Determination of compliance with this requirement shall be made by first observing for visible emissions during normal plant operations. Observations shall be made at least 15 feet and no more than 0.25 mile from the emission point. If visible emissions are observed from the emission point, the owner or operator shall: **(07/14)**
- A. Assume the opacity limit is exceeded, take immediate action to eliminate visible emissions, record the corrective action within 24 hours, and comply with any applicable requirements in 30 Texas Administrative Code (TAC) § 101.201, Emissions Event Reporting and Record Keeping Requirements; or
  - B. Determine opacity using 40 CFR Part 60, Appendix A, Test Method 9. If the opacity limit is exceeded, take immediate action to eliminate visible emissions, record the corrective action within 24 hours, and comply with applicable requirements in 30 TAC § 101.201, Emissions Event Reporting and Record Keeping Requirements.

Contributions from uncombined water vapor shall not be included in determining compliance with this condition. Determination of compliance with this requirement shall be performed and the results recorded quarterly.

44. In accordance with 40 CFR Part 60, Appendix A, Test Method 9 or equivalent, and except for those periods described in 30 TAC § 101.211, opacity of emissions from the shredder and any material transfer point downstream from the shredder shall not exceed 10 percent averaged over a six-minute period. Contributions from uncombined water vapor shall not be included in determining compliance with this condition. **(07/14)**

### **Operational Limitations, Work Practices, and Plant Design**

45. Emission rates are based on and the facilities shall be limited to a maximum hourly throughput of 465 tph and a maximum annual throughput of 1,170,000 tpy. The shredder (EPN SHDR-FUGS) shall be limited to a maximum hourly throughput of 400 tph and a maximum annual throughput of 1,170,000 tpy. **(07/14)**
46. The facilities shall be limited to a maximum operating schedule of 24 hours per day, 7 days per week, 52 weeks per year, and 8,667 hours per year. **(07/14)**
47. The company will provide the TCEQ San Antonio Regional Office with a copy of the in-house training program and "Scrap Specification Guidelines Manual" (furnished to all suppliers) to minimize the potential for processing the following and any other materials: **(9/03)**
  - A. Batteries or any other lead-containing materials;
  - B. Transformers or capacitors containing polychlorinated biphenyls;
  - C. Hazardous chemicals, paint thinners, or solvents;
  - D. Fuel tanks except vehicle fuel tanks which remain on the vehicle body and have been slit, or vehicle fuel tanks which have been removed, punctured, and dried prior to processing;
  - E. Bottles containing butane, oxygen, or other potentially explosive material unless the bottles are opened and empty;
  - F. Appliances containing refrigerants;
  - G. Ammunition; and
  - H. Apparatus containing radioactive material.

A copy of this in-house ("Scrap Specification Guidelines") policy shall be provided to the TCEQ San Antonio Regional Office within 30 days after the issue date of this permit and annually thereafter. **(01/04)**

48. The following stockpiles will be enclosed on at least three sides by an enclosure that extends above the height of the pile: the residue surge pile, the non-ferrous product pile, and the fluff trash pile. The drop points into these piles will be lower than the enclosure walls. **(12/97)**

### **Recordkeeping Requirements**

49. Records shall be maintained at this facility site and made available at the request of personnel from the TCEQ or any other air pollution control program having jurisdiction to demonstrate compliance with permit limitations. These records shall be totaled for each calendar month, retained for a rolling 24-month period, and include the following: **(07/14)**

- A. Quarterly observations for visible emissions and/or opacity determinations from the Shredder Z-Box Separator Fabric Filter Stack (EPN SHDR-STK); **(07/14)**
- B. Hourly production will be based on a monthly total material feed averaged over the total operating hours of the mill during that month;
- C. Annual production will be based on the sum of the previous 12-month total material feed;
- D. Total daily water flow (in gallons per day) to the shredder; **(12/97)**
- E. All malfunctions, repairs, and maintenance of abatement systems, which includes the manufacturer's suggested cleaning and maintenance schedule. **(07/14)**

**Referenced Permit Registrations**

- 50. Permit by Rule (§ 106.261) Registration Number 113053 for a Non-Ferrous Metal Separation System is consolidated by reference. **(07/14)**

**Provisional Operational Restrictions**

- 51. The following conditions shall only be in effect until such time as the pending revision to Federal Operating Permit O1316 is completed. **(07/14)**
  - A. The production of molten steel shall not exceed 1,060,000 tpy.
  - B. The following materials shall not be charged in the furnace: oil filters, borings, and metal turnings.
  - C. The carbon feedstock to the furnace shall have a composite sulfur content of no more than 2 percent.
  - D. The emission rates from EPN RABAGHOUSE shall not exceed:
    - (1) 0.12 pounds of SO<sub>2</sub> per ton of steel cast; and
    - (2) 0.049 pounds of VOC per ton of steel cast.
  - E. The emission rates from EPN FFURNBHSTK shall not exceed:
    - (1) 0.12 pounds of SO<sub>2</sub> per ton of steel cast; and
    - (2) 0.0013 pounds of VOC per ton of steel cast.

Dated: July 24, 2014

# Emission Sources - Maximum Allowable Emission Rates

Permit Number 8248 and PSDTX708M6

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

## Air Contaminants Data

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (5)	
			lbs/hour	TPY (4)
FFURNBHSTK	Pulse-Jet Baghouse Stack – LMS, DEC & Melt Shop Ventilation	CO	36.51	158.21
		VOC	14.39	62.37
		SO <sub>2</sub>	30.00	130.00
		NO <sub>x</sub>	1.92	8.34
		PM	6.59	28.55
		PM <sub>10</sub>	5.80	25.12
		PM <sub>2.5</sub>	5.73	24.83
		Antimony	< 0.01	< 0.01
		Arsenic	< 0.01	< 0.01
		Barium	0.02	0.10
		Benzene	0.44	1.89
		Beryllium	< 0.01	< 0.01
		Cadmium	< 0.01	< 0.01
		Chromium	0.01	0.04
		Copper	< 0.01	0.02
		Iron	0.54	2.34
		Lead	0.03	0.14
		Manganese	0.02	0.07
		Mercury	< 0.01	0.01
		Nickel	0.02	0.10

## Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (5)	
			lbs/hour	TPY (4)
		Selenium	< 0.01	< 0.01
		Silica	0.01	0.03
		Silver	< 0.01	< 0.01
		Thallium	< 0.01	< 0.01
		Vanadium	< 0.01	< 0.01
		Zinc	0.11	0.46
RABAGHOUSE	Reverse Air Baghouse Monitor Vent – EAF DEC and Meltshop Ventilation	CO	162.58	704.50
		VOC	19.34	83.82
		SO <sub>2</sub>	30.00	130.00
		NO <sub>x</sub>	30.47	132.04
		PM	14.58	63.19
		PM <sub>10</sub>	12.83	55.61
		PM <sub>2.5</sub>	12.69	54.97
		Antimony	< 0.01	< 0.01
		Arsenic	< 0.01	< 0.01
		Barium	0.08	0.33
		Benzene	0.58	2.53
		Beryllium	< 0.01	< 0.01
		Cadmium	< 0.01	0.01
		Chromium	0.01	0.06
		Copper	0.01	0.06
		Iron	1.19	5.18
		Lead	0.12	0.51

## Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (5)	
			lbs/hour	TPY (4)
		Manganese	0.12	0.50
		Mercury	0.03	0.15
		Nickel	0.02	0.07
		Selenium	< 0.01	< 0.01
		Silica	0.01	0.06
		Silver	< 0.01	< 0.01
		Thallium	< 0.01	< 0.01
		Vanadium	< 0.01	< 0.01
		Zinc	0.61	2.66
LPHBURN-W	West Ladle Preheater Burner Vent	CO	0.80	3.46
		NO <sub>x</sub>	0.95	4.12
		PM	0.07	0.31
		PM <sub>10</sub>	0.07	0.31
		PM <sub>2.5</sub>	0.07	0.31
		SO <sub>2</sub>	< 0.01	0.02
		VOC	0.05	0.23
LPHBURN-E	East Ladle Preheater Burner Vent	CO	0.80	3.46
		NO <sub>x</sub>	0.95	4.12
		PM	0.07	0.31
		PM <sub>10</sub>	0.07	0.31
		PM <sub>2.5</sub>	0.07	0.31
		SO <sub>2</sub>	< 0.01	0.02
		VOC	0.05	0.23



## Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (5)	
			lbs/hour	TPY (4)
SPRAYSTK	Caster Spray Chamber Stack	CO	0.43	1.84
		NO <sub>x</sub>	0.01	0.05
		PM	0.28	1.21
		PM <sub>10</sub>	0.28	1.21
		PM <sub>2.5</sub>	0.28	1.21
		SO <sub>2</sub>	< 0.01	0.03
		VOC	0.28	1.20
CASTER-MNTOR	Caster Roof Monitor Vent	CO	4.87	20.05
		NO <sub>x</sub>	1.15	4.98
		PM	3.83	16.61
		PM <sub>10</sub>	3.83	16.61
		PM <sub>2.5</sub>	3.83	16.61
		SO <sub>2</sub>	0.69	2.98
		VOC	2.87	11.36
CASTRUNOUT	Caster Run-Out Building Openings	CO	0.18	0.80
		NO <sub>x</sub>	0.22	0.95
		PM	0.08	0.32
		PM <sub>10</sub>	0.07	0.32
		PM <sub>2.5</sub>	0.07	0.31
		SO <sub>2</sub>	< 0.01	< 0.01
		VOC	0.01	0.05
BUCKETS	Charge Buckets Outside Melt Shop Building (6)	PM	0.05	0.17
		PM <sub>10</sub>	0.02	0.08

## Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (5)	
			lbs/hour	TPY (4)
		PM <sub>2.5</sub>	< 0.01	0.01
MELT-FUG	Melt Shop Building Melting Room Fugitives – TOTAL	PM	4.09	17.72
		PM <sub>10</sub>	2.37	10.28
		PM <sub>2.5</sub>	1.76	7.62
		CO	1.53	6.65
		VOC	0.03	0.10
		SO <sub>2</sub>	0.16	0.71
		NO <sub>x</sub>	0.23	0.84
		Antimony	< 0.01	< 0.01
		Arsenic	< 0.01	< 0.01
		Barium	< 0.01	0.02
		Benzene	< 0.01	< 0.01
		Beryllium	< 0.01	< 0.01
		Cadmium	< 0.01	< 0.01
		Chromium	< 0.01	0.01
		Copper	< 0.01	0.02
		Iron	0.34	1.45
		Lead	0.01	0.02
		Manganese	0.02	0.10
		Mercury	< 0.01	< 0.01
		Nickel	< 0.01	< 0.01
		Selenium	< 0.01	< 0.01
		Silica	< 0.01	< 0.01

## Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (5)	
			lbs/hour	TPY (4)
		Silver	< 0.01	< 0.01
		Thallium	< 0.01	< 0.01
		Vanadium	< 0.01	< 0.01
		Zinc	0.05	0.21
REHEATSTK	Reheat Furnace Stack	PM	1.71	5.08
		PM <sub>10</sub>	1.71	5.08
		PM <sub>2.5</sub>	1.47	4.38
		CO	15.75	46.79
		NO <sub>x</sub>	17.25	48.80
		SO <sub>2</sub>	0.14	0.40
		VOC	1.24	3.68
SCRAP - UNLD	Scrap – EAF Feedstock Storage Piles in Scrap Yard – Truck/Railcar Unloading (6)	PM	< 0.01	0.01
		PM <sub>10</sub>	< 0.01	< 0.01
		PM <sub>2.5</sub>	< 0.01	< 0.01
SCRAP WIND 1	Scrap – EAF Feedstock Storage Piles in Scrap Yard – Wind Erosion (6)	PM	-.--	0.01
		PM <sub>10</sub>	-.--	< 0.01
		PM <sub>2.5</sub>	-.--	< 0.01
SCRAP WIND 2	Scrap – Torch Cutting Storage Piles East of Melt Shop Bldg. – Wind Erosion (6)	PM	-.--	< 0.01
		PM <sub>10</sub>	-.--	< 0.01
		PM <sub>2.5</sub>	-.--	< 0.01
SCRAP WIND 3	Scrap – Torch Cutting Storage Piles Southeast of Melt Shop Bldg. – Wind Erosion (6)	PM	-.--	< 0.01
		PM <sub>10</sub>	-.--	< 0.01
		PM <sub>2.5</sub>	-.--	< 0.01

## Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (5)	
			lbs/hour	TPY (4)
SCRAP-CUT 1	Scrap – Torch Cutting and Truck Unloading to/from Torch Cutting Piles East of Melt Shop Bldg. (6)	CO	0.03	0.02
		VOC	< 0.01	< 0.01
		SO <sub>2</sub>	< 0.01	< 0.01
		NO <sub>x</sub>	0.06	0.04
		PM	0.38	0.26
		PM <sub>10</sub>	0.38	0.26
		PM <sub>2.5</sub>	0.38	0.26
SCRAP-CUT 2	Scrap – Torch Cutting and Truck Unloading to/from Torch Cutting Piles Southeast of Melt Shop Bldg. (6)	CO	0.03	0.01
		VOC	< 0.01	< 0.01
		SO <sub>2</sub>	< 0.01	< 0.01
		NO <sub>x</sub>	0.06	0.02
		PM	0.38	0.14
		PM <sub>10</sub>	0.38	0.14
		PM <sub>2.5</sub>	0.38	0.14
SCRAP-RAIL	Scrap – Crane Transfer to Railcars for Transfer to Melt Shop (6)	PM	< 0.01	0.01
		PM <sub>10</sub>	< 0.01	< 0.01
		PM <sub>2.5</sub>	< 0.01	< 0.01
DOLLIMUNLD	Magnesite and Dolomitic Lime – Storage Silo Unloading Hopper (6)	PM	0.20	0.09
		PM <sub>10</sub>	0.10	0.04
		PM <sub>2.5</sub>	0.01	< 0.01
MAGNSILOBH	Magnesite – Storage Silo Filter Vent	PM	0.09	0.05
		PM <sub>10</sub>	0.09	0.05
		PM <sub>2.5</sub>	0.09	0.05

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (5)	
			lbs/hour	TPY (4)
KO61SILOBH	EAF Dust – Storage Silo Filter Vent	PM	0.19	0.82
		PM <sub>10</sub>	0.19	0.82
		PM <sub>2.5</sub>	0.19	0.82
DOLLIMSILO	Dolomitic Lime – Storage Silo Filter Vent	PM	0.26	0.09
		PM <sub>10</sub>	0.26	0.09
		PM <sub>2.5</sub>	0.26	0.09
REFRC-WIND	Spent Refractory Storage Piles East of Melt Shop Bldg.	PM	-.--	0.02
		PM <sub>10</sub>	-.--	0.01
		PM <sub>2.5</sub>	-.--	< 0.01
DOLLIMCONV	Dolomitic Lime – Transfer Point Filter Vent at Silo Loadout Belt Conveyor	PM	0.07	0.03
		PM <sub>10</sub>	0.07	0.03
		PM <sub>2.5</sub>	0.07	0.03
MAGNE-UNLD	Magnesite – Unloading to Storage Pile East of Melt Shop (6)	PM	0.17	0.05
		PM <sub>10</sub>	0.08	0.02
		PM <sub>2.5</sub>	0.01	< 0.01
MAGNE-WIND	Magnesite – Storage Piles – Wind Erosion (6)	PM	-.--	0.03
		PM <sub>10</sub>	-.--	0.01
		PM <sub>2.5</sub>	-.--	< 0.01
MAGNE-CONV	Magnesite – Transfer Point at Silo Loadout Belt Conveyor (6)	PM	< 0.01	0.01
		PM <sub>10</sub>	< 0.01	< 0.01
		PM <sub>2.5</sub>	< 0.01	< 0.01
ALLOYUNLD1	Alloy Aggregate – Storage Piles North of Melt Shop –	PM	< 0.01	< 0.01
		PM <sub>10</sub>	< 0.01	< 0.01

## Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (5)	
			lbs/hour	TPY (4)
	Truck Unloading (6)	PM <sub>2.5</sub>	< 0.01	< 0.01
ALLOYUNLD2	Alloy Aggregate – Storage Piles East of Melt Shop – Truck Unloading (6)	PM	< 0.01	< 0.01
		PM <sub>10</sub>	< 0.01	< 0.01
		PM <sub>2.5</sub>	< 0.01	< 0.01
ALLOYWIND1	Alloy Aggregate – Storage Piles North of Melt Shop – Wind Erosion (6)	PM	-.--	< 0.01
		PM <sub>10</sub>	-.--	< 0.01
		PM <sub>2.5</sub>	-.--	< 0.01
ALLOYWIND2	Alloy Aggregate – Storage Piles East of Melt Shop – Wind Erosion (6)	PM	-.--	0.01
		PM <sub>10</sub>	-.--	< 0.01
		PM <sub>2.5</sub>	-.--	< 0.01
SLAG FUG	Slag drop from furnace to slag tunnel; slag front-end loader transfers to quenching enclosure. (6)	PM	0.45	1.80
		PM <sub>10</sub>	0.21	0.85
		PM <sub>2.5</sub>	0.03	0.13
FESLAGUNLD	Ferrous Slag – Unloading to Storage Piles Near Melt Shop Building (6)	PM	< 0.01	< 0.01
		PM <sub>10</sub>	< 0.01	< 0.01
		PM <sub>2.5</sub>	< 0.01	< 0.01
FESLAGWIND	Ferrous Slag – Wind Erosion of Reclaim Storage Piles Near Melt Shop Bldg. (6)	PM	-.--	0.04
		PM <sub>10</sub>	-.--	0.02
		PM <sub>2.5</sub>	-.--	< 0.01
REFRC-FUG	Spent Refractory/Other Waste Material – Unloading to Storage Piles and Loading to Trucks (6)	PM	< 0.01	< 0.01
		PM <sub>10</sub>	< 0.01	< 0.01
		PM <sub>2.5</sub>	< 0.01	< 0.01

## Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (5)	
			lbs/hour	TPY (4)
SWEEP-FUG1	Trailer/Railcar Sweepings – Trailer/Railcar Cleanout, and Loading to Trucks near OMS Slag Processing Area (6)	PM	0.09	0.02
		PM <sub>10</sub>	0.04	< 0.01
		PM <sub>2.5</sub>	< 0.01	< 0.01
SWEEP-FUG2	Trailer/Railcar Cleanout, Loading of Storage Piles, Screening, and Loading of Trucks – East of Reverse Air Baghouse (6)	PM	0.42	0.05
		PM <sub>10</sub>	0.20	0.03
		PM <sub>2.5</sub>	0.03	< 0.01
SWEEP-WIND1	Trailer/Railcar Sweepings – Wind Erosion of Storage Piles Near OMS Slag Processing Area (6)	PM	-.--	0.08
		PM <sub>10</sub>	-.--	0.04
		PM <sub>2.5</sub>	-.--	< 0.01
SWEEP-WIND2	Trailer/Railcar Sweepings – Wind Erosion of Storage Piles East of Reverse Air Baghouse (6)	PM	-.--	0.39
		PM <sub>10</sub>	-.--	0.20
		PM <sub>2.5</sub>	-.--	0.03
KO61-FUG	EAF Dust – Railcar Loading Enclosure Openings (6)	PM	0.53	0.07
		PM <sub>10</sub>	0.25	0.03
		PM <sub>2.5</sub>	0.04	< 0.01
SHDR-STK	Shredder – Z-Box Separator Fabric Filter Stack	VOC	0.18	0.31
		PM	0.34	1.49
		PM <sub>10</sub>	0.34	1.49
		PM <sub>2.5</sub>	0.34	1.49
		Lead	< 0.01	< 0.01
		Benzene	0.16	0.23
		Cadmium	< 0.01	< 0.01

## Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (5)	
			lbs/hour	TPY (4)
		Chromium	< 0.01	< 0.01
		Mercury	< 0.01	< 0.01
		Zinc	0.01	0.04
SHDR-FUGS	Shredder – Hammermill, Shredder Materials Handling, and Storage Fugitives (6)	VOC	0.02	0.04
		PM	0.61	0.76
		PM <sub>10</sub>	0.29	0.36
		PM <sub>2.5</sub>	0.04	0.05
		Lead	< 0.01	< 0.01
		Benzene	< 0.01	< 0.01
		Cadmium	< 0.01	< 0.01
		Chromium	< 0.01	< 0.01
		Mercury	< 0.01	< 0.01
		Zinc	0.01	0.02
JAW1	Slag Crusher – Transfer to Feeder (6)	PM	0.03	0.02
		PM <sub>10</sub>	0.01	< 0.01
		PM <sub>2.5</sub>	< 0.01	< 0.01
JAW4	Slag Crusher – Jaw Crusher (6)	PM	0.01	< 0.01
		PM <sub>10</sub>	< 0.01	< 0.01
		PM <sub>2.5</sub>	< 0.01	< 0.01
JAW5	Slag Crusher – Discharge from Jaw Crusher (6)	PM	0.03	< 0.01
		PM <sub>10</sub>	0.01	< 0.01
		PM <sub>2.5</sub>	< 0.01	< 0.01
TWR-B	Cooling Tower B –	PM	0.59	2.48



## Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (5)	
			lbs/hour	TPY (4)
	EAF / LMS (6)	PM <sub>10</sub>	0.40	1.74
		PM <sub>2.5</sub>	< 0.01	< 0.01
TWR-A-1	Cooling Tower A-1 (6)	PM	0.37	1.56
		PM <sub>10</sub>	0.25	1.10
		PM <sub>2.5</sub>	< 0.01	< 0.01
TWR-C-1	Cooling Tower C-1 (6)	PM	0.41	1.74
		PM <sub>10</sub>	0.28	1.21
		PM <sub>2.5</sub>	< 0.01	< 0.01
CASTER-TWR	Caster Spray Cooling Tower (6)	PM	0.13	0.54
		PM <sub>10</sub>	0.09	0.39
		PM <sub>2.5</sub>	< 0.01	< 0.01
CASTER-TWR1	Cooling Spray Side Stream Cooling Tower (6)	PM	0.09	0.36
		PM <sub>10</sub>	0.06	0.26
		PM <sub>2.5</sub>	< 0.01	< 0.01
MILL-TWR-1	Rolling Mill Cooling Tower (6)	PM	0.35	1.47
		PM <sub>10</sub>	0.24	1.04
		PM <sub>2.5</sub>	< 0.01	< 0.01
MILL-TWR-2	Rolling Mill Contact Water System Cooling Tower (6)	PM	0.15	0.61
		PM <sub>10</sub>	0.10	0.44
		PM <sub>2.5</sub>	< 0.01	< 0.01
COOLBEDTWR	Rolling Mill Cooling Bed Cooling Tower (6)	PM	0.04	0.19
		PM <sub>10</sub>	0.03	0.13
		PM <sub>2.5</sub>	< 0.01	< 0.01

## Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (5)	
			lbs/hour	TPY (4)
SHDR-TWR1	Shredder Cooling Tower (6)	PM	0.03	0.12
		PM <sub>10</sub>	0.02	0.09
		PM <sub>2.5</sub>	< 0.01	< 0.01
OMS-SLAG	OMS Slag Handling and Processing Near East End of Property (6)	PM	0.68	0.70
		PM <sub>10</sub>	0.32	0.33
		PM <sub>2.5</sub>	0.05	0.05
ENG-IS	300-hp IS UPS Emergency Generator Engine	PM	0.66	0.03
		PM <sub>10</sub>	0.66	0.03
		PM <sub>2.5</sub>	0.66	0.03
		CO	2.00	0.10
		VOC	0.74	0.04
		SO <sub>2</sub>	< 0.01	< 0.01
		NO <sub>x</sub>	9.30	0.47
ENG-CASTR	1600-hp Caster/LMS Emergency Generator Engine	PM	1.12	0.06
		PM <sub>10</sub>	1.12	0.06
		PM <sub>2.5</sub>	1.12	0.06
		CO	8.80	0.44
		VOC	1.13	0.06
		SO <sub>2</sub>	0.02	< 0.01
		NO <sub>x</sub>	38.40	1.92
ENG-WATER	120-hp Water Emergency Stand-by Engine	PM	0.26	0.01
		PM <sub>10</sub>	0.26	0.01
		PM <sub>2.5</sub>	0.26	0.01

## Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (5)	
			lbs/hour	TPY (4)
		CO	0.80	0.04
		VOC	0.30	0.01
		SO <sub>2</sub>	< 0.01	< 0.01
		NO <sub>x</sub>	3.72	0.19
BLASTMAINT	Sand Blast Cleaning for Equipment Maintenance (6)	PM	0.30	0.06
		PM <sub>10</sub>	0.07	0.01
		PM <sub>2.5</sub>	0.07	0.01
		Silica	0.30	0.06
PAINTSTACK	Vehicle Maintenance Paint Shop Stack	PM	0.03	0.06
		PM <sub>10</sub>	0.03	0.06
		PM <sub>2.5</sub>	0.03	0.06
		VOC	6.00	13.00
C-SILO300	Carbon Storage Silo 300 Filter Vent	PM	0.18	0.05
		PM <sub>10</sub>	0.18	0.05
		PM <sub>2.5</sub>	0.18	0.05
C-SILO301	Carbon Storage Silo 301 Filter Vent	PM	0.18	0.05
		PM <sub>10</sub>	0.18	0.05
		PM <sub>2.5</sub>	0.18	0.05
C-HOPPER	Carbon Unloading Hopper Filter Vent	PM	0.14	0.08
		PM <sub>10</sub>	0.14	0.08
		PM <sub>2.5</sub>	0.14	0.08
Permit by Rule (PBR) Registration 113053 is incorporated by reference. Sources remain authorized by the PBR.				
§106.261	Non-Ferrous Metal Separation System	PM	0.51	1.80

Emission Sources - Maximum Allowable Emission Rates

- (1) Emission point identification - either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources, use area name or fugitive source name.
- (3) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1  
NO<sub>x</sub> - total oxides of nitrogen  
SO<sub>2</sub> - sulfur dioxide  
PM - total particulate matter, suspended in the atmosphere, including PM<sub>10</sub> and PM<sub>2.5</sub>, as represented  
PM<sub>10</sub> - total particulate matter equal to or less than 10 microns in diameter, including PM<sub>2.5</sub>, as represented  
PM<sub>2.5</sub> - particulate matter equal to or less than 2.5 microns in diameter  
CO - carbon monoxide
- (4) Compliance with annual emission limits (tons per year) is based on a 12 month rolling period.
- (5) Planned startup and shutdown emissions are included. Maintenance activities are not authorized by this permit.
- (6) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.

Date: July 24, 2014